EXHIBIT 46

Texoma HIDTA

2017 Threat Assessment

June 2017 Regional Intelligence Support Center Texoma HIDTA



This Threat Assessment is the product of the Texoma HIDTA Regional Intelligence Support Center and has been approved by the Texoma HIDTA Executive Board. It was prepared in collaboration with federal, state and local law enforcement personnel assigned to HIDTA Initiatives, as well as non-HIDTA law enforcement counterparts throughout the region.

While relying heavily on input from law enforcement counterparts throughout Texas and Oklahoma, this assessment of the drug threat within our region is solely the opinion of the Texoma HIDTA Regional Intelligence Support Center and Texoma HIDTA management. The Texoma HIDTA does not speak for any of our law enforcement partners with regards to the specific drug threat in their specific city or communities.

I. Table of Contents

I. Table of Contents	managan ang ang a
II. Executive Summary	
III. Description of the Threat	
A. Drugs Trafficked	6
1. Methamphetamine	
2. Pharmaceuticals	12
3. Heroin	12
4. Synthetic Drugs	
5. Cocaine	25
6. Marijuana	26
B. Drug Trafficking and Money Laundering Organizations	30
C. Drug Transportation Methods	37
D. Marijuana Production	<i>.</i> 40
E. Methamphetamine Production	41
F. Prescription Drug Diversion	43
G. Drug Consumption	43
H. Illicit Finance	44
I. Emerging or Other Drug Threats	.,47
IV. Outlook	48
V. Methodology	50
VI Appendix of Contributing Agencies & Offices	51

II. Executive Summary

The overall drug trafficking threat to the Texoma HIDTA region remains stable. Law enforcement and intelligence data clearly indicates methamphetamine continues to pose the most significant drug threat to the region as North Texas, the Texas Panhandle and Oklahoma are flooded with cheap, high purity methamphetamine produced in Mexico. Prescription drugs, heroin, synthetic cannabinoids, cocaine/crack cocaine, and marijuana also all pose a significant threat to communities throughout the Texoma HIDTA region. In particular, increased flow of cocaine into the region and signs of increasing distribution of synthetic opioids, such as fentanyl and fentanyl-laced drugs, are the most significant emerging trends facing the region.

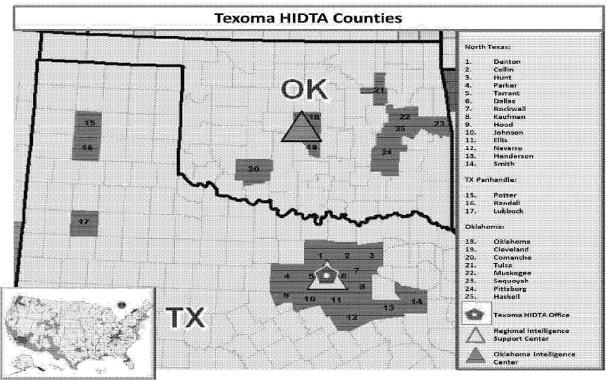


Figure 1: Texoma HIDTA Counties and AOR

Both the Dallas-Fort Worth and Oklahoma City metropolitan areas continue to serve as key command and control distribution points for drug loads sent by Mexican Drug Trafficking Organizations (DTOs), who dominate the wholesale trafficking of most major drug types encountered in the region. Mexican DTOs continue to send large shipments of methamphetamine, heroin, cocaine, and marijuana to the Texoma HIDTA area of responsibility (AOR) on a regular basis, either for local distribution or as a transshipment point for loads destined to the Midwest and Eastern United States. DTOs and Money Laundering Organizations (MLOs) continue to funnel large sums of drug proceeds through the area,

Outside of the threat from Mexican DTOs, diversion of controlled pharmaceutical drugs from the medical and pharmacy environment and the sale of smokeable synthetic cannabinoids from retail establishments also pose a significant public health and public safety threat in the region.

Case: 1:18-op-45274-DAP Doc #: 120-47 Filed: 10/30/24 6 of 53. PageID #: 4249

UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

Though often lacking the stigma of more "hard-core" drugs, these controlled substances are every bit as destructive as other drugs and negatively impact the quality of life and safety of communities throughout Texas and Oklahoma. Additionally, independent DTOs who obtain controlled substances from internet and Dark Web sources, are posing an increasing threat to the Texoma HIDTA region. Over the last year, law enforcement agencies in North Texas, the Texas Panhandle, and Oklahoma have encountered independent traffickers and DTOs engaged in the distribution of synthetic drugs such as fentanyl and synthetic cathinones that were obtained from China-based sources of supply.

In addition to Mexican DTOs, local organizations including street and prison-based gangs, orchestrate the distribution of drugs at the retail level. As a whole, street gangs operating in the Texoma HIDTA region include subsets of traditional gangs, with a professed allegiance to parent national or regional gangs (i.e. "Bloods," "Crips," "Surenos," etc.), and hybrid gangs that function in a much looser sense and are more apt to create alliances and working arrangements with traditional rivals with the ultimate objective of making more money. Both types of gangs contribute to rising levels of violent criminal activity in major metropolitan areas in the region, including drug-related shootings and homicides, aggravated assaults, thefts, armed robberies, burglaries and fraud. In many areas of the Texoma HIDTA region, gangs have elevated their distribution activities to mid-level distribution of multiple pounds of controlled substances, particularly methamphetamine.

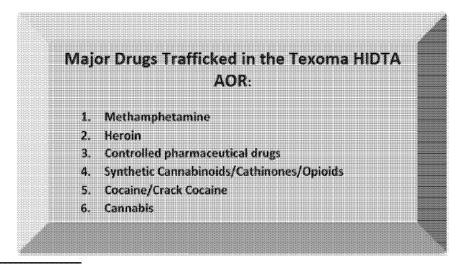
III. Description of the Threat

A. Drugs Trafficked

The Texoma HIDTA includes 17 Texas counties and 8 counties in Oklahoma and encompasses over 16,900 square miles with a total population exceeding 10 million people. The Texoma HIDTA encompasses three distinct geographical regions¹:

- North Texas, commonly referred to as the Dallas-Fort Worth (DFW) Metroplex. This area includes a primary satellite area centered around Tyler in east Texas;
- West Texas/Panhandle region, including the major cities of Lubbock² and Amarillo;
- Oklahoma, with the main drug market centered around Oklahoma City, and primary satellite areas of Tulsa and McAlester.

Law enforcement agencies across the Texoma HIDTA AOR consistently identify methamphetamine as the greatest drug threat in their communities. Heroin, controlled pharmaceutical drugs, powder and crack cocaine, marijuana, and synthetic drugs are also significant drug threats within the AOR. ³ The drug trafficking activity in each of the three Texoma HIDTA geographical regions, though similar in many aspects, varies according to which drugs are most in demand; which drugs present the greatest community health danger; which drugs are most available and affordable; and which drugs contribute most to violent crime. In addition, the regions differ in terms of the role and influence of specific Mexican-based drug cartels and their supply of illicit drugs to the areas.



When possible, this threat assessment describes the drug and money faundering threats to the Texoma HIDTA as a whole. However, where significant regional differences in drug trends exist between Texas and Oklahoma, they will be addressed separately.

² Lubbock County, TX is a HIDTA designated county; in 2017, the Texoma HIDTA Executive Board approved a unit within the newly formed Lubbock Metropolitan Narcotics and Violent Gang Task Force as the Llano Estacado Drug Initiative. Pending funding, this initiative will be a joint initiative by DEA Lubbock, HSI Lubbock, Lubbock PD, and the Lubbock County SO to target the most significant DTOs operating in the Lubbock area.

³ Ranking specific drugs in an area the size of the Texoma HIDTA is difficult. While methamphetamine is clearly the largest drug threat throughout the area, prescription drugs, heroin, cocaine, cannabis, and synthetic drugs rank closely in their respective threat level and could easily be interchanged.

Case: 1:18-op-45274-DAP Doc #: 120-47 Filed: 10/30/24 8 of 53. PageID #: 4251

UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

1. Methamphetamine

In recent years, the vast majority of agencies located within the Texoma HIDTA AOR responding to the DEA National Drug Threat Surveys identified methamphetamine as their overall greatest drug threat. Methamphetamine was also cited by respondents as the drug most responsible for driving violent crime and property crime within the AOR. Law enforcement agencies report methamphetamine availability remains high while wholesale prices continue to decrease.

The methamphetamine entering the AOR is controlled by Mexican DTOs, which oversee the production of methamphetamine in Mexico and the subsequent importation of methamphetamine shipments into U.S. Law enforcement investigations in the Texoma HIDTA region have identified links between Texoma HIDTA AOR methamphetamine distributors and nearly every major Mexican cartel/DTO, and methamphetamine shipments have been sent to the region from most major points of methamphetamine production in Mexico, including Michoacán, Guerrero, Colima, Jalisco, and Sinaloa. In recent years, there has been a dramatic increase in the amount of methamphetamine seized by law enforcement in the Texoma HIDTA region, a function of both effective law enforcement targeting of Mexican methamphetamine distribution cells and of the sheer volume of methamphetamine arriving in and transiting the AOR. DTOs engaged in receiving and distributing wholesale quantities of methamphetamine also routinely distribute heroin and cocaine as well.

From 2009 to 2016, Texoma HIDTA Initiative seizures of methamphetamine increased approximately 750%, from 112 kilograms in 2009 to over 950 kilograms in 2016. Although the increase has been the most dramatic in the DFW Metroplex, law enforcement in Oklahoma and in the West Texas/Panhandle areas has also seen significant increases in methamphetamine seizures over the last several years.⁴

⁴ The Texoma HIDTA has added a number of initiatives over the last several years; therefore, relative increases in drug seizures are also the result of increased seizure reporting to the Texoma HIDTA PMP; however, analysis of seizures by the DEA Dallas Field Division, which has the same geographic footprint as the Texoma HIDTA, shows similar trends. Additionally, the largest increase in reported drug seizures has come from the inclusion of the DEA Amarillo Resident Office as a HIDTA initiative; many of these seizures had been reported under the Texoma HIDTA DHE statistics.

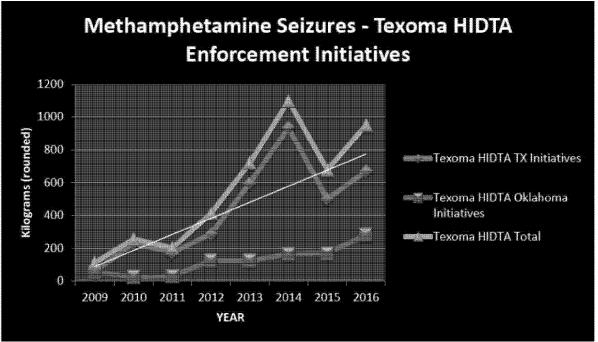
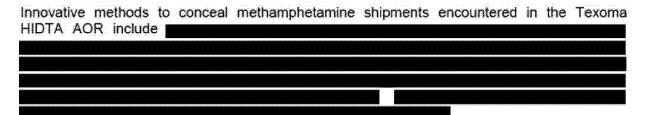


Figure 2: Methamphetamine Seizures: CY 2009-2016 (Texoma HIDTA PMP data)

The Mexican DTOs use sophisticated methods to conceal methamphetamine shipments sent to north Texas and Oklahoma. In particular, the perfection of techniques used to conceal, transport, and convert large shipments of liquid methamphetamine⁵ has resulted in larger shipments and, ultimately, larger quantities of finished crystallized methamphetamine.



The increase in the volume of methamphetamine shipments has been accompanied by the frequent use of methamphetamine conversion laboratories by DTOs. Methamphetamine conversion labs are now commonplace in the areas throughout the Texoma HIDTA region and are typically located in rental houses in residential areas where the methamphetamine is converted during a process that involves heating the methamphetamine in large cooking pots, "cleaning" the methamphetamine with acetone or other solvents, and allowing the methamphetamine to re-crystallize as the liquids evaporate. Though the process does not require extensive technical skills or chemistry knowledge, Mexican DTOs at times have to bring in "experts" from Mexico or other parts of the United States to assist with the conversion process. A conversion laboratory typically produces approximately six to eight pounds of methamphetamine per gallon, though the results can vary dramatically depending on the concentration of the methamphetamine in the suspension liquid and the skill of the "cook."

⁵ "Liquid" methamphetamine is finished methamphetamine that has been dissolved in a solvent or is in a liquid suspension.

In addition to Mexico-based DTOs, methamphetamine is also distributed locally at the wholesale and retail level throughout the Texoma HIDTA AOR by independent traffickers, members of Hispanic (and increasingly African American) street gangs, and Caucasian gangs, including the Aryan Brotherhood.

North Texas: Up until early 2014, the Los Caballeros Templarios (LCT) leadership largely oversaw the organization and operation of the methamphetamine market in the Dallas/Fort Worth Metroplex. During this time, the DEA Dallas traced the majority of the methamphetamine in the region back to LCT. In 2013, LCT's Mexico-based leadership began facing increased pressure from GOM authorities, rival DTOs, and various self-defense and/or community police groups in Mexico who challenged their authority, often with the encouragement of rival cartels. These internal distractions made it increasingly difficult for LCT leadership to maintain the same level of control/influence over methamphetamine distribution cells operating in the United States. Yet, up until the early part of 2014, investigative intelligence indicated the DTO was still responsible for a large percentage of the illicit methamphetamine in the region.

Since 2014, distribution cells operating in the region have continued to receive large loads of methamphetamine from a number of different suppliers and/or transportation cells. While many of the individuals involved in these transactions are based out of Michoacán, and were previously aligned with LCT, their current allegiances are increasingly unclear as trafficking activities in Michoacán have been fractured with methamphetamine suppliers now often claiming allegiance to a variety of Mexican Cartels and DTOs, including the factionalized remnants of LCT headed by CPOT

and other emerging DTOs/off-shoot factions of various cartels based in Michoacán and Guerrero. Additionally, DEA Dallas and other federal investigations have noted organizations based in Sinaloa, Guadalajara, Guanajuato, and other locations in Mexico have also been sending large shipments of methamphetamine to the DFW area, often through routes passing through Southern California, Arizona, and El Paso, a further sign other Mexican DTOs are taking advantage of infighting among organizations in Michoacán and Guerrero in order to establish a footprint in the Texoma HIDTA region.

During this period of violence in Mexico, what is significant is that the flow of methamphetamine to the Dallas-Fort Worth area has not abated; in fact, wholesale prices have continued to trend downward, and a various points in 2016, intelligence indicated Michoacán and Guerrero-based DTOs were offering methamphetamine for as low as \$5,000 per kilogram. This plummet in the wholesale price, which is less than a quarter of the price commanded five to six years ago, has largely resulted from the removal of price/supply controls that were formerly enforced by the LCT leadership as their influence of DFW area distributors has waned. Recent intelligence from both FBI and DEA investigations since early 2017 have suggested higher level members of Michoacán and Guerrero-based DTOs are attempting various strategies in order to constrain the methamphetamine supply in Dallas in order to drive prices higher, but it remains to be seen how successful these efforts will be.

Though methamphetamine conversion/recrystallization laboratories appear throughout the DFW area, several Texoma HIDTA initiatives have noted a trend of conversion laboratories being placed in suburban or rural areas due to the traffickers' belief that law enforcement will be less likely to identify the location. By way of example, in July 2016, the Texoma HIDTA Southern Drug Initiative seized multiple kilograms of methamphetamine in both solid and liquid form after targeting a DTO that used a warehouse located in Forney, Texas, a suburb located to the southeast of the DFW area in a largely rural area.



Figure 3: Meth conversion lab seized in Forney, TX by Texoma HIDTA Southern Drug Initiative (Source: DEA Dallas)

Oklahoma: Methamphetamine has been the most pervasive drug threat in Oklahoma for several years. Mexican DTOs oversee the production of methamphetamine in Mexico and import it in bulk quantities into Oklahoma. The last several years have seen a significant drop in the wholesale price as the market has been saturated with low cost, but high purity, methamphetamine produced in Mexico and transported to Oklahoma. The drug's wholesale price has more or less been halved over the past two years, with current prices only a fraction of the \$40,000 per kilogram price the drug commanded back in 2008. The tumbling prices have coincided with increased methamphetamine availability within the region, particularly as DTOs have perfected the movement of methamphetamine in solution ("liquid meth") and the use of local methamphetamine conversion laboratories to reconstitute the methamphetamine from liquid to crystal form. Conversion laboratories used to convert and "clean" liquid methamphetamine into crystal methamphetamine have also been encountered in Oklahoma cities to a lesser extent than North Texas but are still encountered.

The wholesale methamphetamine market in Oklahoma City is dominated by Mexican DTOs. In Central Oklahoma, methamphetamine traffickers are linked primarily to the Sinaloa Cartel, while traffickers in Central Oklahoma and in the northeast region of Oklahoma are most frequently affiliated with Michoacán and Guerrero-based DTOs. Despite its proximity to the DFW drug market, much of the methamphetamine seen in Oklahoma enters the United States through

entry points in Southern California and Arizona, although Dallas-based organizations also supply large quantities of methamphetamine to Oklahoma-based DTOs, particularly in Tulsa. Intelligence from law enforcement agencies in Texas and Oklahoma has suggested that due to the arrest of high-ranking Sinaloa Cartel managers in the Chicago area, the Sinaloa Cartel has begun to increase its operational presence and organizational command elements in Oklahoma City. As with the DFW area, Oklahoma-based DTOs are also increasingly impacted and supplied by Mexico-based sources associated with the CJNG cartel. Most importantly, both Oklahoma City and Tulsa have, in their own rights, become primary distribution points for Mexico-based DTOs, with cell heads communicating directly with command and control elements in Mexico as opposed to secondary distribution locations supplied via other US cities.

In Oklahoma City and Tulsa, street level distribution of methamphetamine by independent traffickers encompassing most ethnic groups, and is heavily dominated by Hispanic distributors and organizations, as well as Caucasian gangs such as the Aryan Brotherhood. The Irish Mob and Indian Brotherhood prison gangs dominate the Oklahoma Prison System and control a large portion of the methamphetamine trafficking in the region.

According to medical examiner data collected by the state of Oklahoma, methamphetamine is the leading cause of overdose deaths in the state, and has been attributed as a factor in at least 328 deaths in 2016, a 21% increase from 2015. Though as a whole, opioids account for more deaths, in the last year, deaths from methamphetamine eclipsed deaths from oxycodone and hydrocodone.⁶

Oklahoma law enforcement continues to encounter small methamphetamine laboratories in the northeastern part of the state. However, since 2011, EPIC Clandestine lab seizure reporting for Oklahoma shows a steady downward trend in the number of seized laboratories and dump sites, likely due to the increasing supply of cheap Mexico-produced methamphetamine. The majority of laboratories are small one-pot/shake and bake laboratories producing less than two ounces of methamphetamine at a time. Law enforcement in Oklahoma is encountering methamphetamine conversation laboratories, though not to the same extent as in Texas.

West Texas/Texas Panhandle:

As with other areas of the Texoma HIDTA, West Texas/Texas Panhandle counties have also seen dramatic increases in methamphetamine seizures over the last several years in and around the population centers of Lubbock and Amarillo.

In Lubbock, methamphetamine is the single largest drug threat in the region, as an unending supply of high purity crystal methamphetamine has been transported into the region by Mexican DTOs. Veteran narcotics investigators in the region have gone from routinely seizing minimal ounces or grams to pounds and kilograms in almost every investigation. For example, in 2012, Lubbock County SO seized 103 grams of methamphetamine; in 2016, they seized over 90 pounds. One seizure involved 65 pounds of methamphetamine recovered an area hotel room in a single event. From March to May 2017, law enforcement in the region made multiple individual seizures totaling over 65 kilograms of methamphetamine that was in Lubbock or destined for the local Lubbock drug market. Law enforcement investigation have identified direct ties between

⁶ Oklahoma Medical Examiner statistics received by OBN and DEA; also cited in http://oklahomawatch.org/2017/03/26/as-meth-surges-overdose-deaths-reach-new-record-in-state/

Lubbock-based methamphetamine distributors and major, Sinaloa-cartel linked DTOs operating in El Paso, Arizona, and Chihuahua, Mexico. Within Lubbock, methamphetamine is distributed from Mexico DTOs to local DTOs, including members of gangs such as the Texas Syndicate, Latin Kings, West Texas Tangos, Bloods, and others.

Although many of the seizures made in the Amarillo area

the significant rise in

is indicative of the increased flow of methamphetamine through
the Texas Panhandle area. In addition to responding to
Interstate 40 corridor in West Texas, the Texas Panhandle Drug Initiative has targeted large
scale methamphetamine distribution organizations operating in the Texas Panhandle region.
Like other areas in the Texoma HIDTA, the Panhandle region has seen large, multi-kilogram
shipments of methamphetamine sent to Amarillo directly from sources of supply in Mexico and
has identified the presence of methamphetamine conversion laboratories with their AOR. As
recently as April 2017, DEA Amarillo, in conjunction with Amarillo PD and Texas DPS, seized a
total of 11.4 pounds of methamphetamine and one gallon of liquid methamphetamine following
law enforcement operations against an Amarillo-based DTO.

2. Heroin

A vast majority of respondents to the 2016 DEA National Drug Threat Survey in both Texas and Oklahoma identified heroin availability, demand, and distribution activities as an increasing drug threat. Analysis of Texoma HIDTA drug seizure statistics indicates a steady increase in heroin seizures over the last five years; this trend is also mirrored in seizure statistics by DEA Dallas Field Division offices over the same time period.

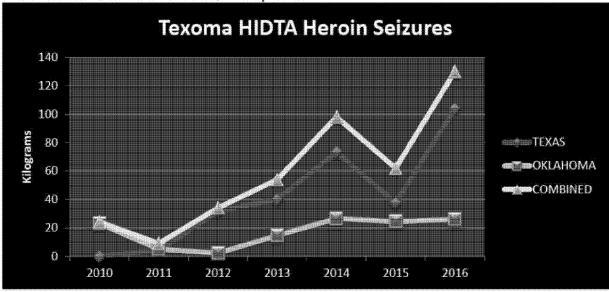


Figure 4: Heroin Seizures by Texoma HIDTA Initiatives, 2010-2016

Mexican black tar heroin, and to a lesser extent, Mexican brown heroin, remain the most prevalent form of heroin in the Texoma HIDTA region. A number of law enforcement agencies continue to gather intelligence regarding the potential distribution of "china white" heroin arriving in or transiting through the region from Mexico, and over the last year, a number of seizures of

white heroin have occurred within the Texoma HIDTA AOR. Given the predominance of Mexican DTOs in the Texoma HIDTA AOR, this heroin, classified by DEA as "Alleged Mexican White" (AMW) heroin, is believed to be Mexican-produced white heroin, and not South American, Southeast Asian, or Southwest Asian heroin. AMW heroin is believed to be either a mixture of white South American heroin and Mexican brown heroin or an entirely home-grown Mexican heroin derived from Mexico-produced poppies, with morphine extracted by Mexican methods and processed into heroin hydrochloride using South American processing techniques.⁷

Mexican DTOs dominate the transportation of Mexican heroin to the HIDTA region. Mexican heroin is transported to destination cities in the DFW, Oklahoma City, and Tulsa areas primarily by privately owned automobiles, pickup trucks and commercial buses. The DFW area is the major source of heroin for outlying cities within the Texoma AOR within Texas; Oklahoma City and Tulsa receive heroin shipments from organizations based both in DFW and in Arizona and Southern California. A number of law enforcement agencies, including DEA and FBI Dallas, have observed numerous instances involving co-mingled heroin and methamphetamine shipments from Mexico, and it is common for Mexican DTOs to distribute both methamphetamine and heroin in wholesale amounts.

Intelligence obtained from law enforcement investigations in the Texoma HIDTA region has continued to support the correlation between prescription drug abuse and eventual heroin abuse. Prior use of and dependency on prescription opiate pills (such as oxycodone and hydrocodone) is a normal pathway leading to heroin use; this seems to be especially true for suburban and rural area teenagers and young adults. Among middle to upper-middle class young adults, this progression from prescription drug abuse to heroin use comes often comes with little or no idea of the realities of heroin use, dependency, or the withdrawal syndrome associated with heroin addiction. Users have consistently cited the lower price as one of the main causes for this switch from prescription drug abuse to heroin. Since 2013, law enforcement agencies within the Texoma HIDTA investigations have encountered several instances of traffickers distributing both heroin and diverted pharmaceutical drugs at both street and wholesale distribution levels.

North Texas:

As with many cities, the Dallas-Fort Worth (DFW) Metroplex has been experiencing increases in heroin trafficking and distribution at both wholesale and retail levels, although not at the dramatic levels seen in the northeast and eastern United States. Data from the Centers of Disease Control (CDC) list Texas as a state that has not seen statistically significant increases in overdose deaths since 2014; this is likely due to the prevalence of cheaply produced methamphetamine as an alternate drug of abuse, and due to the local drug market being heavily weighted towards black tar heroin that, as of yet, has not as frequently been combined or laced with potent fentanyl.

DEA National Drug Threat Assessment and DEA Special Testing and Research Reporting (July 2014)

Texas Crime Lab Submissions - Heroin 2016

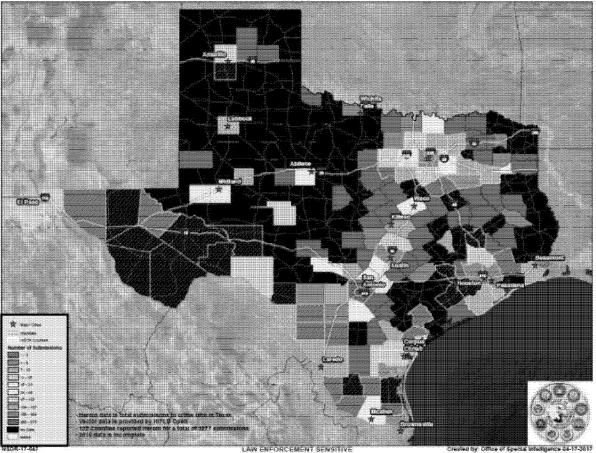


Figure 5: Relative numbers of heroin exhibits submitted to Texas crime labs in 2016 (Source: NFLIS data)

Nonetheless, the death statistics highlight the increasing threat posed by heroin and prescription opiate abuse among the user populace of the DFW area. Data from the CDC National Center of Health Statistics indicates there were at least 172 deaths involving heroin and 76 deaths involving other opiates (including morphine, hydrocodone, and oxycodone) in the DFW area and surrounding counties in 2015. Not surprisingly, the majority of these deaths occurred in the main population centers of north Texas, Dallas County (including the city of Dallas) and Tarrant County (including the city of Fort Worth).⁸

⁸ Centers for Disease Control and Prevention, National Center for Health Statistics. Multiple Cause of Death 1999-2015 on CDC WONDER Online Database, released December, 2016. Data are from the Multiple Cause of Death Files, 1999-2015, as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program.

	Heroin	Other Opiates		Heroin	Other Opiates
Dallas Co:			Collin Co		
2011	59	27	2011	17	19
2012	83	33	2012	17	13
2013	78	24	2013	12	20.
2014	107	40	2014	15	12
2015	98	32	2015	20	
Tarrant Co			Denton CO		
2011	37	21	2011	10	
2012	42	39	2012	0	13
2013	31	20	2013	11	10
2014	50	34	2014	10	7
2015	42	30	2015	12	14

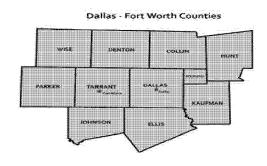


Figure 6: Heroin Overdose Deaths (Source: CDC Wonder Database, Multiple Causes of Death Data)

Since 2011, Dallas and Tarrant Counties have generally experienced year over year increases in deaths, although deaths decreased slightly in both counties from 2014 to 2015; Collin and Denton counties also consistently experienced double digit numbers of deaths related to heroin and opiate poisoning in 2014.

The DFW area has seen a steady increase in heroin seizures over the last five years and is currently routinely seeing heroin seizures in conjunction with methamphetamine trafficking. The primary form of heroin encountered with the DFW area is still Mexican black tar heroin.

While many of the organizations involved in the transportation of heroin to the DFW area operate on an independent basis, DEA investigations have linked a number of major Mexican drug cartels to heroin trafficking activity in Dallas, including Los Caballeros Templarios, the Beltran-Leyva Organization

and several smaller affiliate groups, the Sinaloa Cartel, and Los Zetas.

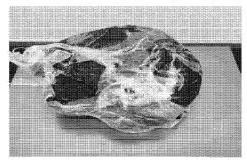


Figure 7: 2.5 Kilos Heroin seized by Texoma HIDTA DEA Western Initiative and Tulsa Task Force in April 2016

Recent investigations have found that local DTOs are increasingly invoved in the wholesale distribution of white powder heroin of Mexican origin. Previously, white powder heroin seizures in the AOR involved shipments transiting the area, primarily via bus. Recent seizures of white powder heroin from DFW area stash houses would seem to indicate that local DTOs have become more involved in distributing that form of the drug than in years past. For example, the Texoma HIDTA FBI-led Northern Drug Initiative, as well as DEA and FBI groups in Dallas and Fort Worth, have been conducting several investigations into Mexican DTOs based in Michoacán and Guerrero, Mexico that are receiving both black tar and white heroin. Investigative data indicates much of the white heroin is ultimately destined for other areas, such as Chicago, but distributors have offered to sell ounce and kilogram quantities locally. Intelligence also indicates some distributors may be lacing heroin with fentanyl.

In addition to receiving heroin shipments for the local market, DFW-area heroin traffickers operate as a transshipment point for heroin shipments destined for other cities. Investigation by Texoma HIDTA initiatives have had a nexus to other major metropolitan cities, including Chicago, Illinois;

Philadelphia, Pennsylvania; New York and New Jersey; Louisville, Kentucky; various cities in Oklahoma, and elsewhere.

Heroin suppliers based in Dallas and Fort Worth supply lower level distributors and users in surrounding suburbs. Retail sales often occur at businesses (such as auto dealerships, barber shops, and bars), trap houses, and in open-air markets. Investigations have observed distribution of heroin by middle and lower level suppliers to members of DFW-area street gangs, including affiliates of the Crips, Surenos 13, and Tango Blast.

Since 1999, Texas law requires the mandatory reporting of overdoses of controlled substances to the Texas Department of State Health Services (DSHS) by hospitals and physicians. The Texas Poison Center Network (TPCN) is the repository for this data and its reporting to the DSHS. The TPCN operates six regional poison centers in Amarillo, Dallas, El Paso, Galveston, San Antonio, and Temple. Hospitals and physicians are required to report overdoses of controlled substances directly to the TPCN within 24 hours.

Analysis of TPCN data indicates that the north central Texas area⁹ as a whole has historically had significantly more reporting of heroin overdose exposures than any other region in Texas; Dallas, Tarrant, and Denton counties alone accounted for approximately 62% of all of the reported heroin exposures for Texas in 2013. Data from the TPCN indicates a steady rise of heroin exposures reported from medical providers in the North Texas area since 2000, although recent years have shown the reported rates levelling off, particularly when population growth is taken into account ¹⁰:

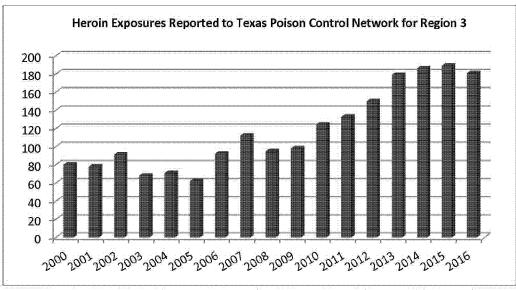


Figure 8: TPCN Reported Heroin Exposures (Source: Texas Dept. of State Health Services)

Oklahoma:

Mexican brown and black tar (MBT) heroin remains the most prevalent form of heroin available in the State of Oklahoma, but white heroin is on the increase. Wholesale heroin distribution is largely controlled by Mexican DTOs, which supply heroin distribution cells operating in

⁹ TPCN data is classified into geographic regions; Region 3 encompasses the greater Dallas-Fort Worth area and surrounding counties, including the counties of Collin, Cooke, Dallas, Denton, Ellis, Fannin, Grayson, Hood, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker, Rockwall, and Tarrant.

¹⁰ Source: Texas Poison Center Network data received from Texas Dept of State Health Services.

Oklahoma City. Heroin availability continues to rise as larger amounts of heroin are sent to the Oklahoma City and Tulsa areas from DTOs based in the Mexican states of Sinaloa, Nayarit, Michoacán, Guerrero, and Guanajuato. Heroin shipments sent to Oklahoma City and Tulsa are often co-mingled with other types of controlled substances, including cocaine and methamphetamine.

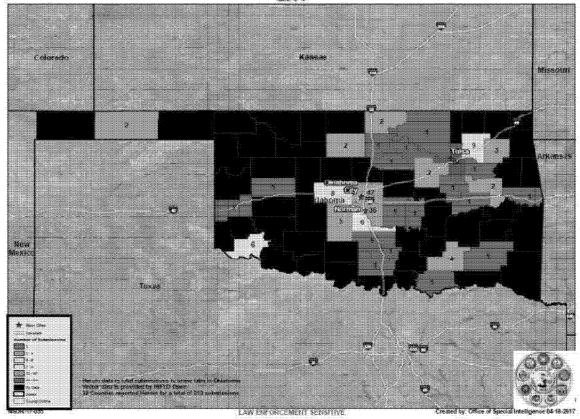
Texoma HIDTA initiatives based in Oklahoma and DEA Oklahoma City have noted the

The Oklahoma-based workers receive multi-kilogram shipments of heroin and then repackage the heroin for distribution at the street level in \$40 and \$90 balloons.

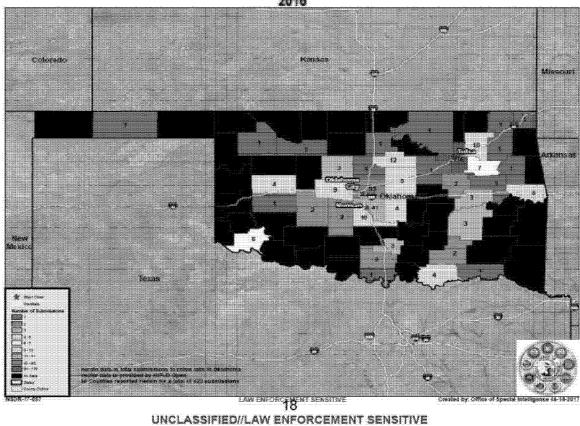
estimated selling, on average, 20 small balloons and 30 to 40 large balloons a day.

Of particular note, Oklahoma has seen a significant increase in the number of heroin exhibits submitted to laboratories in recent years. In 2014, 32 counties in Oklahoma reported heroin as the suspected drug on a total of 213 submissions. Unfinalized data for 2016 indicates 38 counties reported heroin on a total of 423 submissions, a 98.59% increase. Oklahoma and Tulsa counties in particular have seen a dramatic increase in the amount of heroin exhibits seized. In 2016, there were at least 49 reported overdose deaths involving heroin, an increase from 31 in 2015.

CAM EMPORICEMENT SENSITIVE
Oklahoma Crime Lab Submissions - Heroin
2014



Oklahoma Crime Lab Submissions - Heroin 2016



Texas Panhandle:

The Texas Panhandle is a significant transshipment corridor for heroin sent from Southern California and Arizona to a number of U.S. cities in the mid-west and east coast of the United States, including Oklahoma. Texas DPS, along with county and local law enforcement, routinely interdict multi-kilogram seizures of Mexican black tar and brown heroin along the Interstate 40 corridor. In FY 2016, the Texoma HIDTA Texas Panhandle Initiative seized nearly 67 kilograms of heroin, a dramatic increase from the year before, highlighting the extent heroin shipments across the country are increasing due to demand, particularly in the eastern United States.

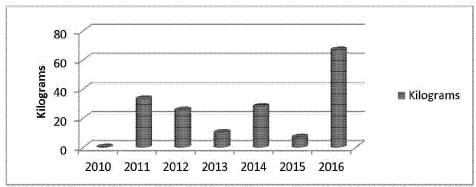


Figure 9: Heroin Seized by DEA Amarillo/Texas Panhandle Drug Initiative, FY 2010-FY 2016 (2nd Qtr.) (Source: DEA Dallas)

Additionally, in its responses DEA National Drug Threat Survey in recent years, the Amarillo Police Department indicated heroin availability, demand, and distribution is an increasing threat. Law enforcement investigations have identified Dallas and Reno, Nevada as source locations for heroin consumed locally in the Amarillo/Texas Panhandle area.

3. Pharmaceuticals

The diversion of pharmaceutical drugs continues to be a significant drug threat to the Texoma HIDTA region. Hydrocodone, oxycodone, alprazolam and codeine with promethazine continue to be the main diverted controlled substances within the AOR. Almost all of the respondents to the 2016 DEA National Drug Threat Survey within the AOR indicated moderate or high availability of pharmaceutical drugs, with half citing increasing availability, demand, and illegal distribution activity involving pharmaceuticals. The diversion of both narcotic and depressant pharmaceuticals was described as high or moderate by nearly every responding agency.

Pharmaceutical diversion is often erroneously viewed as "white collar drug crime" because of the misperception that its violators consist largely of professionals such as physicians, pharmacists and clinics. However, the pill mill operation is a thinly veiled organized criminal enterprise that, increasingly, results in the street-level distribution of powerful controlled substances by the same violent criminal organizations that distribute crack cocaine, heroin, methamphetamine, and other controlled substances. Law enforcement throughout the Texoma HIDTA AOR continue to see instances where controlled pharmaceutical drugs are distributed on the street alongside traditional illicit drugs and, in fact, are used as a stepping stone by street dealers to lead users down the path to heroin addiction. Once controlled pharmaceutical drugs are successfully diverted from the doctor/pharmacy environment, they are subject to the same

market forces as other illicit drugs, and law enforcement continues to see efforts by DTOs to ship diverted pharmaceuticals to other states

in order to earn a higher profit. During 2016, a number of Texoma HIDTA Initiatives that are part of the Texas Anti-Gang Center (TAG) in North Texas routinely encountered DFW area gangs distributing pharmaceutical drugs alongside traditional drugs like crack cocaine, marijuana, and heroin. For example, Dallas-area Tango Blast gang members have been known to distribute fake Xanax pills, described as 10 times more powerful than regular Xanax. A number of agencies in the DFW area have encountered criminal organizations engaged in armed robberies of pharmacies where criminals have stolen opioid prescription drugs, including hydrocodone, promethazine cough syrup, and alprazolam. For example, the

targeted a local gang in the Pleasant Grove area of Dallas that distributed, among other drugs, Promethazine with codeine and diverted pharmaceutical pills.

The Texoma HIDTA does not have a Pharmaceutical Diversion Initiative. However, the DEA Dallas Field Division Diversion Program and Tactical Diversion Squads (TDS) in Dallas and Fort Worth target doctors, pharmacies, and drug distribution organizations involved with improperly prescribing and/or distributing controlled substances. In recent years, the Dallas TDS

In 2017, several Texoma HIDTA initiatives encountered counterfeit oxycodone and hydrocodone tablets that contained fentanyl.

has investigated various medical clinics operating as "pill mills." These rogue clinics operate as prescription drug ring leaders obtain recruits, typically homeless individuals, to pose as patients for a small payment. The pill mills then provide the patients with prescriptions for narcotic drugs without having a legitimate medical purpose. The medical clinics involved with pill mills make money on each "patient visit", which typically ranges from \$400-600 per visit. The fraudulently obtained prescriptions are then taken by the ring leaders to small, independent pharmacies to be filled. Recent intelligence obtained indicates the ring leaders will travel throughout the US in an effort to fill the prescriptions. Prescriptions obtained from the Dallas area pill mills were taken to pharmacies throughout Texas, in addition to, Arkansas, Colorado, Kansas, Mississippi, and Oklahoma. The prescriptions are for various narcotics such as, hydrocodone, oxycodone, promethazine with codeine, and Xanax®. It is estimated these pill mills distribute over 2 million dosage units onto the streets of Texas and or Louisiana.

In addition, DEA investigates other prescription drug diversion methods, such as doctor shopping, pharmacy thefts, prescription forgeries, and ordering from internet pharmacies and "Dark Web" drug marketplaces. DEA Dallas has encountered a number of instances of individuals and drug trafficking organizations producing counterfeit pharmaceutical drugs, particularly Xanax-branded alprazolam. In addition, law enforcement in the DFW area, including DEA and the US Postal Service, have noted numerous instances over the last several years of

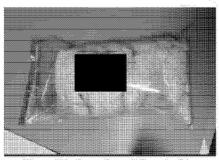


Figure 10: Oxycodone Pills seized by Texoma HIDTA Eastern Drug Squad

individuals and organizations receiving international mail shipments of controlled pharmaceuticals from countries in Asia, especially China. These shipments have included large amounts of controlled substances, including steroids and steroid powder, phentermine, clonazepam, sibutramine and oxycodone. Over the last several, years, the DEA Dallas Tactical Diversion Squad has seized a number of laboratories where steroids and other pharmaceuticals were being produced from raw materials that had been ordered from overseas sources. In 2016, the Texoma HIDTA Eastern Drug Squad targeted a DTO that utilized the Dark

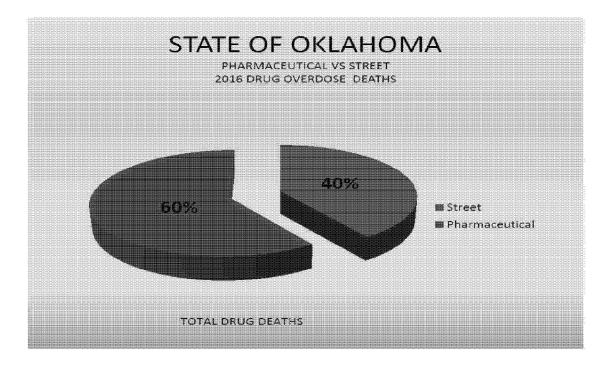
Web and Bitcoin to order large amounts of Xanax, as well as LSD and MDMA from sources in China and elsewhere. Agents arrested 3 individuals and seized 55,000 Alprazolam tablets, 5,000 MDMA pills, and 102 dosage units of LSD.

Oklahoma:

Diverted pharmaceuticals continue to be a predominant threat throughout the state of Oklahoma. Oklahoma has also routinely encountered prescription drug rings operating in conjunction with physicians and pain clinics that prescribe controlled substances outside the scope of normal medical practice. Hydrocodone, oxycodone, and alprazolam, and codeine with promethazine are the primary controlled substances diverted within the Dallas FD's Oklahoma region. As with other areas of the country, a close correlation exists between CPD abuse and an eventual transition to heroin abuse. According to medical examiner office data, overdoses deaths from abuse of hydrocodone, oxycodone, fentanyl, alprazolam, morphine, diazepam, and activities in Oklahoma City and Tulsa have been primarily geared toward ensuring DEA Registrants are in compliance with the regulations of the Controlled Substances Act, as well as targeting "pill mill" and fraudulent prescription operations in conjunction with other law enforcement agencies, including the Oklahoma Bureau of Narcotics. For example, one doctor investigated was linked to numerous pharmaceutical narcotic overdose deaths, and was known by drug seekers, convicted drug felons, and professional "doctor shoppers" to provide prescriptions for schedule II-V drugs including oxycodone, hydrocodone, alprazolam, fentanyl, and morphine. Numerous hospitals in the area noted newborn children were being found with opiate addiction as a result of prescriptions provided by the doctor, who was known to prescribe upwards of 360 dosage units on a single prescription.

CPDs are routinely distributed at the street level throughout Oklahoma with other traditional controlled substances like powder and crack cocaine, heroin, and methamphetamine. Other common diversion methods in the Oklahoma include doctor shopping, pharmacy thefts, prescription forgeries, and ordering via internet pharmacies and "Dark Web" drug marketplaces. Customers are known to come from neighboring states like Arkansas into Oklahoma to obtain prescriptions and pills.

As noted above, although methamphetamine is the single drug responsible for the most overdose deaths in 2016, as a category, prescription opioids and heroin account for more deaths in the state of Oklahoma. In 2016, hydrocodone was noted in 104 deaths and oxycodone was noted in 157 deaths. As a whole pharmaceutical drugs accounted for approximately 60% of Oklahoma overdose deaths in 2016, compared to 40% for traditional street drugs. Pharmaceutical drugs contributed to 80% of non-fatal drug overdoses in Oklahoma in 2015.



4. Synthetic Drugs

Synthetic drugs, especially Synthetic Cannabinoids and increasingly, Synthetic Opioids, are an existing and persistent drug threat in the Texoma HIDTA. A number of DEA offices within the Texoma HIDTA AOR identify synthetic drugs as one of their top five drug threats and a large number of Texoma HIDTA region respondents to the DEA National Drug Threat Assessment describe synthetic cannabinoids in particular as an existing or increasingly significant drug problem.

Because of the wide variety of chemicals and substances used in synthetic drugs and the often inconsistent and untested methods used to produce the finished product, a significant threat of overdose or serious physical and psychological damage exists with synthetic drug use, due to the ease at which a "bad batch" of the drugs can be created. Over the last several years, hospitals and communities throughout North Texas and Oklahoma have reported several instances where emergency rooms have experienced a rash of suspected synthetic drug overdoses in a relative short period of time.

Smokeable Synthetic Cannabinoids (SSCs):

Over the last several years, investigations in the DFW area, Tyler, Amarillo, Lubbock, Oklahoma City, Tulsa, and McAlester have all identified significant drug trafficking operations involving the distribution of Smokeable Synthetic Cannabinoids (SSCs) from retail establishments in their area. SSCs, designed to mimic the effects of marijuana, typically consist of various types of dehydrated organic matter that is then sprayed with synthetic cannabinoid chemicals that are obtained from sources in China or India in powder form, and then dissolved in liquid. Because these chemicals attempt to mimic the effects of THC, the terms "synthetic cannabis/synthetic marijuana" and "fake weed" are often used to refer to the substances. Such branding, however, intentionally misleads the dangerous and addictive nature of synthetic cannabinoids, as the variety of chemical compounds used to manufacture the spice vary widely in potency and often obtain other substances such as synthetic opioids, formaldehyde, and acetone. One banned

substance, HU-210, is estimated to be between 100 to 800 times more potent that THC. The net result is a substance that is often far more potent and addictive than marijuana, can result in hallucinations and irrationally dangerous and combative behavior, and can result in hospitalization or death with little warning. As a testament to the addictive nature of SCCs, DEA investigations have noted multiple instances of constant foot traffic at all hours of the day in and out of retail establishments where SCCs are sold.

Manufacturers adjust the chemical compounds as they are banned by federal and state governments in order to market their product as a legal drug alternative in head shops, tobacco and convenience stores, or on online marketplaces. Synthetic cannabinoids are often marketed as "potpourri," "herbal incense" or aromatherapy products and are packaged under a variety of ever changing brand names in small packets with bright colors and innocuous names such as "Blueberry Kush," "Scooby Snax," and "Field of Green." The packaging is meant to reinforce the notion that the product offers a "safe" high, but also typically includes warnings that it is not for human consumption in a thinly veiled effort to skirt controlled substance laws.



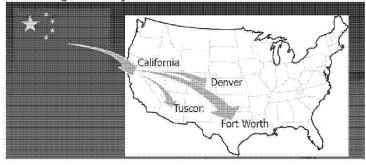
Figure 11: SSC packaging (Source: Western Drug Squad)

Synthetic cannabinoid investigations across the Texoma HIDTA region have targeted both storefronts involved in direct sales of synthetic cannabinoids to customers and synthetic cannabinoid production

facilities. The production facilities feature large amounts of organic material and processing tables where the banned chemicals are sprayed onto the organic material, which is then allowed to dry before packaging. These facilities have been located in industrial parks, retail businesses, and residences, and, as with any drug production facility, pose a significant public health and safety danger due to the presence of volatile and toxic chemicals.

In 2016, multiple Texoma HIDTA Initiatives and other law enforcement agencies in North Texas, the Texas Panhandle, and Oklahoma continued to see retail distribution of SSCs via smoke shops/head shops, as well as individuals engaged in the manufacture and wholesale distribution of SSCs. For example, Lubbock PD and the Lubbock County SO have reported synthetic cannabinoid abuse and addiction as a significant issue among the homeless population in the

From June 2015 to September 2016, the Texoma HIDTA Western Drug Squad and Southern Money Laundering Initiatives conducted an OCDETF investigation into synthetic cannabinoid distribution activities at several locations throughout Fort Worth, Texas. In September 2016, after an 18-month investigation, agents executed seven federal arrest warrants, nine search warrants, and seven seizure warrants on bank accounts. To date, the investigation has resulted in over \$1.3 million in asset seizures, 14 arrests, and the seizure of over 150 kilograms of synthetic cannabinoids.



23
UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

area, and in January 2017, the Lubbock University Medical Center estimated five to eight patients are seen a day in various states of overdose¹¹. As a response to law enforcement actions, many distributors have altered their operations by

Data from the Texas Poison Control Data indicates that since 2014 mentions of exposure to synthetic cannabinoids for the north Texas region have been trending slightly downward. This may be due to concerted law enforcement efforts over the last several years to target distributors and wholesale suppliers. However, due to the difficulty in quickly identifying SSC substances, these numbers are believed to vastly underreport the actual number of exposures.

Synthetic Opioids:

The availability of synthetic opioids, including fentanyl and fentanyl analogues, has increased throughout the Texoma HIDTA AOR in the last year. Though North Texas and Oklahoma have not yet experience the rash of fentanyl-linked overdoses that the Northeast and Midwest United States have seen, law enforcement agencies in the Texoma HIDTA are increasingly encountering fentanyl and other synthetic opioid drugs. There are two main sources for synthetic opioids in the region; Mexican DTOs who are increasingly trafficking bulk fentanyl alongside other drugs like cocaine, methamphetamine, and heroin, and independent DTOs who obtain the drug from sources in China and other countries through negotiations and purchases over the Dark Web and other internet sources. Recent encounters in the Texoma HIDTA region include:

 Since late 2015, DEA Lubbock, in conjunction with HSI Lubbock, Lubbock PD, Lubbock County SO, and the US Postal Inspection service have investigated a fentanyl distribution organization whose membership created a drug market in the South Plains for fentanyl consumption through the importation of significant quantities of fentanyl and fentanyl analogues from sources of supply in China that distributed via the Internet, Dark Web, and Virtual Currency. This DTO was directly responsible for the distribution of synthetic

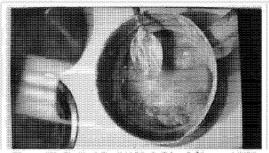


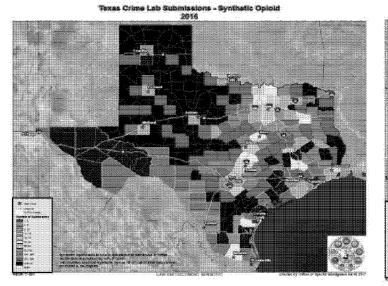
Figure 12: Fentanyl seized in Lubbock (Source: DEA Lubbock)

opioids that led to at least 9 overdoses over the last year. While law enforcement successfully dismantled the organization in late 2016 through aggressive law enforcement action, agents have continued to identify other suspects that are involved in the distribution of controlled substances obtained from sources of supply in China. While fentanyl overdoses have temporarily abated, recent intelligence has indicated many users are now seeking heroin to feed their addictions.

 A number of agencies, including the Texoma HIDTA Eastern Drug Squad, encountered counterfeit oxycodone and hydrocodone tablets that, when analyzed, tested positive for fentanyl and fentanyl analogues. In many cases, the distributors, who were selling the

http://www.everythinglubbock.com/news/kamc-news/lpd-synthetic-marijuana-sales-hurting-lubbock-and-its-homeless-citizens/640013459

- counterfeit pills alongside other drugs like methamphetamine and heroin, claimed to be unaware the pills contained fentanyl.
- In recent months, seizures of kilogram quantities of fentanyl powder, believed originally to be "China White" Heroin or other drugs, have occurred at ports of entry at the U.S.-Mexico border in south Texas, as well as in the Houston area.
- In December 2016, the Collin County (Texas) Medical Examiner's office confirmed two separate overdoses of furanyl fentanyl, a fentanyl analogue; Texas Poison Control data indicated there were 24 reported exposures to fentanyl for the North Texas region in 2016:
- In April 2017, the Texoma HIDTA Commercial Smuggling Initiative, along with the US Postal Inspection Service and DEA, discovered a clandestine pill manufacturing laboratory and seized 29 drug exhibits that contained the synthetic opioid U-47700. The suspect is believed to have purchased the U-47700 from sources in China via the internet.



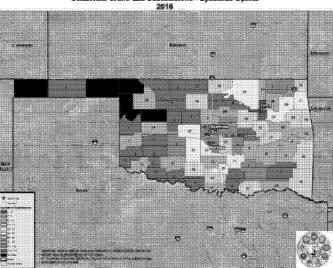


Figure 13: Submission of Synthetic Opioid Exhibits (including controlled pharmaceutical drugs) by county, 2015 (Source: NLFIS data mapped by DEA Special Intelligence Division

5. Cocaine

Over the last several years, seizure statistics for both Texoma HIDTA Initiatives and the DEA Dallas Field Division have reflected decreases in the amount of cocaine seized as the amount of methamphetamine seized has risen. A majority of respondents within the Texoma HIDTA AOR who responded to the 2014 DEA National Drug Threat Assessment identified cocaine and crack cocaine availability and demand as stable or decreasing.

Over the last year, however, the wholesale price of a kilogram of cocaine has trended downward, from approximately \$27,000 to \$30,000 per kilogram in 2015 in North Texas to \$23,000 to \$25,000 in 2016, and approximately \$28,000 to \$31,000 per kilogram in Oklahoma in 2016 from \$33,000 in 2015, though prices can fluctuate widely based on the quantity purchased and the relationship with the sources of supply. Investigative information indicates

¹² DEA investigative data; DEA Bulletin DEA-HOU-BUL-092-17: Fentanyl Emerges in Houston

cocaine is becoming more frequently trafficked in multi-kilogram quantities by organizations that have been more heavily involved in methamphetamine and heroin distribution. Cocaine and its derivative crack are generally available at the street level in all areas of the Texoma HIDTA region. Recent DEA Dallas investigations have resulted in seizures ranging from 10 to 30 kilogram quantities of cocaine from DTOs involved in coordinating the transportation of cocaine from Laredo to Dallas via While law enforcement in the region has not witnessed the multi-hundred kilogram cocaine shipments seen five to ten years ago, law enforcement agencies throughout the region are routinely reporting that cocaine and crack cocaine seem to be increasingly available both within the region and transiting the region. For example, the Texoma HIDTA McAlester Drug Initiative recently assisted in February and March 2017 that involved the seizure of 14 kilograms and 42 kilograms of cocaine, respectively. Though in both instances, the cocaine was destined for other parts of the county, the seizures speak to an increase in the cocaine drug flow through the Texoma HIDTA region.

Mexican DTOs continue to dominate the transportation and wholesale distribution of powder cocaine in the Texoma HIDTA region. Many of the DTOs take advantage of poly-drug smuggling opportunities, so it is not uncommon for such organizations to be simultaneously engaged in wholesale cocaine, marijuana, methamphetamine and heroin trafficking. DTOs in North Texas are heavily influenced by the Los Zetas and Gulf Cartels, as well as DTOs in Michoacán and Guerrero, while DTOs in Oklahoma City and Tulsa receive cocaine shipments from North Texas, Arizona, and Southern California from organizations linked to Los Zetas, the Gulf Cartel, and the Sinaloa Cartel. Law enforcement in the West Texas/Panhandle area have also encountered Mennonite DTOs engaged in smuggling of significant quantities of marijuana and cocaine to various locations in the United States and Canada, including Oklahoma; while these organizations are believed to that are believed to be affiliated with Mexican DTOs like the Juarez and Sinaloa Cartels, they generally function as their own entity.

Mexican DTOs also dominate the retail distribution of powder cocaine in most of the Texoma region, though African American distributors and street gangs are also heavily involved in some locations, including parts of Collin and Henderson Counties in Texas. In addition to Mexican DTOs, independent distributors of African American, Caucasian, and Hispanic ethnicity and African American and Hispanic street gangs are also involved in retail distribution of cocaine and crack. Intelligence from DEA Tyler has identified early signs that cocaine may be supplanting methamphetamine as a preferred drug and that powder cocaine and crack cocaine are making a resurgence in specific user populations.

Crack cocaine distribution and use is centered in the lower income areas throughout the Texoma HIDTA AOR. African American traffickers and street-level gangs control much of the distribution of crack, with many distributors coming to the Dallas-Fort Worth Metroplex to purchase powder cocaine that is then converted to crack for distribution in cities throughout North Texas and Oklahoma. Wholesale distribution of crack cocaine is conducted by African American street gangs in Dallas, Oklahoma City, and Lubbock. Fort Worth, Tulsa, and Oklahoma City also encounter African American DTOs in this capacity, although those cities also report Hispanic DTOs involved in crack cocaine distribution. In Tulsa, crack cocaine distribution is one of the driving forces behind acts of violence committed by the Hoover Crips street gang, who have been estimated to control 70% of the crack cocaine distribution in Tulsa.

6. Marijuana

Marijuana remains the most abundant and accessible illicit drug in the Texoma HIDTA region. Three major types of marijuana are readily available in the AOR: Mexican imported marijuana, domestic outdoor cultivated cannabis, and indoor hydroponic grow marijuana. Of these, Mexican imported marijuana represents the primary threat. Seizures suggest that Mexican DTOs continue to transport large loads of marijuana to the Dallas/Fort Worth and Oklahoma City areas, where they are broken down into smaller loads to be transported to destinations throughout the Midwest and Northeast. For example, in February 2017, law enforcement seized approximately 3,300 pounds of marijuana from a repair shop in a suburb of Dallas from a Mexican DTO. Intelligence indicates the marijuana was distributed locally and in other states, including Kansas. In March 2017, law enforcement seized approximately 985 pounds of marijuana that had been transported to Dallas from Laredo.

Although marijuana of Mexican origin dominates the North Texas and Oklahoma markets in terms of bulk amounts, both outdoor and indoor marijuana cultivation are encountered frequently. Large-scale outdoor marijuana grow operations are encountered in rural and undeveloped areas.

For example:

- In September 2016, the Texoma HIDTA McAlester Drug Initiative and District 18
 Drug Task Force executed a search warrant and seized a marijuana grow
 operation in McCurtain, Oklahoma. Agents seized 372 marijuana plants, as well
 as nine firearms.
- In June 2015, the DEA Oklahoma City HIDTA Group and Oklahoma Judicial District 21 agents seized 33 marijuana plants from a residence in Noble, Oklahoma.
- DEA Tyler identified a DTO operating in East Texas that is relying on Mexican National laborers to cultivate numerous grows. This DTO has ties to Michoacán, Mexico and unconfirmed loose ties to the La Familia and Los Zetas cartels. From July 2015 to March 2017 multiple marijuana fields and approximately 77,000 cannabis plants linked to this DTO were eradicated. As a result of a collective law enforcement effort, 10 individuals were arrested, and approximately 20 pounds of marijuana, approximately \$100,000 USC, 4 vehicles, and 17 weapons were seized.

Throughout all areas of the Texoma HIDTA AOR, law enforcement is increasingly encountering higher-grade hydroponic marijuana transported into and through the region from California, Washington State, and Colorado. These shipments typically involve independent DTOs who take advantage of cannabis legalization in these states in order to obtain high-grade marijuana to sell in Oklahoma and Texas.

• In November 2016, DEA Oklahoma City, the Oklahoma Bureau of Narcotics, and the DEA Orlando, FL District Office executed a controlled delivery of 100 pounds of high-grade marijuana to Orlando. Five defendants arrived to take possession of the marijuana, including two individuals from South Carolina. One of the suspects from South Carolina was a convicted felon and a subsequent search warrant by the DEA Charleston RO led to the seizure of 29 firearms, 10,000 rounds of ammunition, 1.7 kilograms of powder cocaine, and 10 additional pounds of marijuana.

	ing 250 pounds of high grad
iomestically produced ipproximately \$1,720,0	 HC wax, with a combined value of Amarille
	with DEA offices in Pennsylvania
ind Florida to	
	# *:-
	This operation resulte



Due to its proximity to Colorado, Oklahoma regions of the Texoma HIDTA AOR face a particularly high threat from the illegal distribution of marijuana grown in Colorado. Numerous investigations have highlighted how permissive marijuana laws in one state are invariably exploited by drug traffickers and directly impact other states. Drug traffickers based in Oklahoma have repeatedly made efforts to purchase property and marijuana farms in Colorado in order to grow marijuana that will eventually be sent to Oklahoma drug marketplaces. Several of these traffickers have discussed trading Colorado-grown marijuana for cocaine, and have been involved in trafficking other illegal substances like diverted pharmaceuticals and cocaine, as well as illegally trafficking in weapons. As recently as March 2016, a DEA Oklahoma investigation led to the seizure of distribution amounts of marijuana labeled as "medical marijuana" from Colorado; that the marijuana was seized along with a large amount of illicitly obtained Xanax and other controlled substances, as well as firearms, is a clear indication of the diversion of "regulated" marijuana for criminal purposes.

Case: 1:18-op-45274-DAP Doc #: 120-47 Filed: 10/30/24 30 of 53. PageID #: 4273

UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

A number of law enforcement agencies in the Texoma HIDTA AOR have noted the presence of marijuana concentrates and edibles. Marijuana concentrates are extracted from leafy marijuana in many ways, but the most frequent method is butane extraction. THC extraction labs, which are potentially hazardous and prone to explosions due to the use of butane, propane, carbon dioxide, and other hazardous and explosive materials in the extraction process, have not been encountered within the Texoma HIDTA AOR with the same frequency or scale as they have been in other areas of the U.S. Distributors of marijuana concentrates often obtain marijuana concentrates such as hash oil from manufacturers in California and Colorado and officers are increasingly encountering marijuana and THC edibles in the form of candies, cookies, and baked goods.

B. Drug Trafficking and Money Laundering Organizations

Mexico-based DTOs: Mexican DTOs linked to major Mexican drug cartels dominate drug trafficking and money laundering operations at the wholesale level within the Texoma HIDTA AOR. Mexican DTOs exert near total control over drug trafficking operations throughout the region, with the exception of prescription drug and synthetic drug distribution. These DTOs manage sophisticated national and international smuggling, transportation, and distribution cells, and frequently employ advanced security and communication techniques, gather intelligence, and use violence and intimidation to control organization members and secure smuggling corridors in Mexico. The segmented and compartmentalized nature of many of these DTOs limits communication among organizational elements to foster operational efficiency and evade law enforcement detection.

Over the last two years, enforcement actions by the Government of Mexico have resulted in the arrests or deaths of numerous cartel leaders whom have direct impact on the Texoma HIDTA region. The Knights Templar (Los Caballeros Templarios or LCT) has been functionally disbanded in Mexico as rival sub-groups vie for control. The arrests of Los Zetas leaders have destabilized their organization for an extended period of time. The arrest of has impacted the Sinaloa cartel's operations, at least in the short term. The capture of several successive leaders of the Gulf Cartel, including have disrupted the cartel's operations in Mexico to the point that the organization is weaker than at almost any time in its long history.

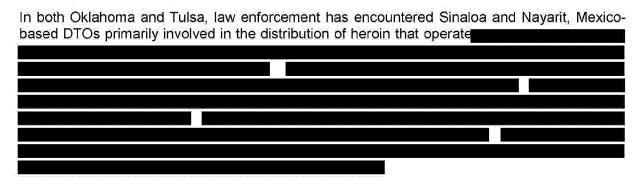
The infighting and disruption among the Mexican DTOs has not, however, substantially impacted the flow of drug shipments to the DFW area, especially with regards to methamphetamine and heroin shipments. Michoacán and Guerrero-based DTOs still dominate as the primary source of supply for methamphetamine sent to the DFW area; however, these DTOs may be operating with more autonomy than in recent years and, absent the previous strong controls on methamphetamine prices that had been imposed by the LCT leadership, each organization appears to be sending as much of their product to North Texas and Oklahoma as possible, with little regard for the decreasing prices. Though recent intelligence suggests the Mexico-based leadership of large-scale DTOs is attempting to impose greater price discipline to increase the wholesale price of methamphetamine, it remains to be seen if these efforts will have long-term staying power.

Investigative intelligence shows that the Dallas-Fort Worth Metroplex has continued to be a primary hub for cells linked directly to Los Caballeros Templarios, the Gulf Cartel and Los Zetas. In the Texas Panhandle and in Oklahoma, the Juarez and Sinaloa Cartels have also been very active. However, investigative intelligence indicates that several other cartels, including the Gulf Cartel and Beltran-Leyva Organization also exert influence on trafficking operations into and through the Texoma HIDTA AOR. Most significantly, though, has been the spread of DTOs with links to nearly every major Mexican Cartel in the Texas HIDTA region. Within the DFW area, intelligence suggests a growing presence of distribution cells that are substantially linked to, if not outright operational cells of, the Cartel de Jalisco Nuevo Generacion (CJNG), the Sinaloa Cartel, and emerging, quasi-independent DTOs in Guerrero and Michoacán. Both DEA and FBI have observed a certain level of reconstitution of LCT/La Familia Michoacana-linked methamphetamine distribution cells that were previously targeted in law enforcement between

2006 and 2012. This is largely due to the longstanding-presence in the Dallas area of Michoacán-based DTO membership with substantial familial and business ties in the area; as such, the Dallas-Fort Worth based membership is easily rebranded in response to DTO changes in Mexico. Law enforcement in the region area also continues to see movement by DTO members to North Texas from other areas of the country. FBI intelligence indicates high-ranking members of the Sinaloa Cartel have recruited, then dispatched, individuals to establish a methamphetamine distribution organization in the Texas Panhandle centered on Lubbock; significantly, the investigation revealed the Sinaloa Cartel exercised direct operational control over the distribution cell.

Mexican DTOs are also involved in acts of violence in the Texoma HIDTA region. This violence is typically the outgrowth of their drug trafficking activities, including violence occurring during drug rip-offs and extortions, assaults, or kidnappings that occur by the larger DTO when a particular trafficker has drugs or drug proceeds stolen or seized by law enforcement. Generally, violent acts are directed at a specific trafficker for personal or organizational reasons, as opposed to broader battles between DTOs over control of specific drug markets like those seen in Mexico. The most spectacular example of this occurred in May 2013, when operatives for a wing of the Beltran-Leyva organization based in Monterrey, Mexico brazenly executed a Mexican attorney in Southlake, Texas who had previously worked on behalf of incarcerated Gulf Cartel leader In May 2016, three individuals were convicted in federal court in Fort Worth for their role in a broad-ranging, multi-year, technologically sophisticated effort to locate the victim so that he could be killed. 13

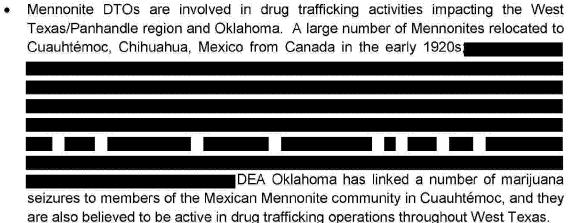
Overall, Mexican DTOs operate easily in the area, facilitated by a network of family members and longtime associates of trafficking organizations that are based in the region. Historically, DFW area cell heads have reported directly to high-ranking command and control members of both LCT and Los Zetas, often only one step removed from the top tier of leadership. Similarly, investigations by DEA in Oklahoma City have found direct links between Oklahoma cells and significant members of the Sinaloa Cartel hierarchy. Recent investigations have also noted CJNG-related drug trafficking activity in Oklahoma, particularly the Tulsa area. Additionally, some Mexican DTOs, particularly those involved in methamphetamine distribution, are increasingly basing their operations in less populated, more rural areas of the AOR, including east Texas around Tyler, and in west Texas around Lubbock. This increase is due to successful law enforcement efforts against these DTOs in major Texas cities, leading individual DTO members to seek other locations away from perceived law enforcement scrutiny.



¹³ Joint FBI-DEA External Intelligence Note: North Texas Murder by Beltran Leyva Organization Demonstrates Extensive Covert Preoperational Planning and Control with No Warning to US Law Enforcement, 20 April 2017

Independent DTOs: In addition to DTOs directly linked to Mexican drug cartels, numerous types of independent DTOs operate throughout the Texoma HIDTA AOR. These DTOs often have a substantial impact on the quality of life in smaller communities outside the major metropolitan areas of the Texoma HIDTA AOR. For example, in the past year, Texoma HIDTA Initiatives have targeted methamphetamine distribution organizations operating in rural areas of Collin County north of DFW and in Smith and Cherokee Counties in East Texas; these organizations have directly supplied the local drug markets and contributed to drug related crime in the area. Examples of independent DTOs operating within the Texoma HIDTA include:

- Independent Hispanic organizations typically have relationships with cartel-linked Mexican sources of supply in the area, from whom they obtain cocaine, marijuana, methamphetamine, and heroin. This mid-level tier of distributors often serves as the funnel for illicit drugs to independent distributors and street gangs in the region.
- Independent Caucasian methamphetamine DTOs also typically receive their methamphetamine shipments from Hispanic sources of supply, including some cartel distribution cells.
- Ethnic Asian DTOs routinely engage in a variety of drug trafficking activities. Within
 the Texoma HIDTA region, ethnic Asian DTOs have been involved in the distribution
 of hydroponic marijuana obtained from California sources of supply and have also
 been linked to outdoor and indoor marijuana grows in the DFW area. Ethnic Asian
 DTOs have also been involved in the distribution of methamphetamine, as well as
 club drugs like MDMA and Molly.
- Synthetic Cannabinoid DTOs typically operate with an aura of quasi-legitimacy as
 the bulk of their distribution activities occur via retail storefronts. These operations
 have been typically led by individuals of Caucasian, Pakistani, and Indian descent.



As discussed above, the emergence of DTOs engaged in the distribution of synthetic opioids is a particularly troublesome development given the highly addictive and potentially life-threatening nature of fentanyl and other substances. Nationwide, Mexican DTOs are increasingly engaged in distribution of fentanyl in powder and pill form alongside other drugs. Additionally, fentanyl and other synthetic opioids are attractive to independent DTOs, who can acquire the drugs or their raw material via internet and Dark Web sources and create their own production facilities with little cost, as seen in Lubbock with the fentanyl organization targeted by DEA and other agencies. For example, in addition to the investigations mentioned above, the FBI has identified

criminal networks that are engaging in the distribution of fentanyl-laden drugs, including pills and diverted fentanyl patches and sprays.

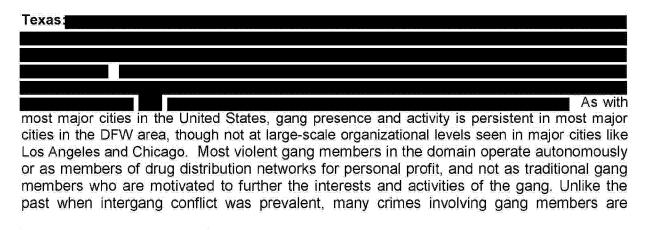
Gangs: A number of street and prison gangs operate throughout the Texoma HIDTA AOR. Throughout the various cities within the Texoma HIDTA, both traditional and "hybrid" gangs operate at varying levels, While traditional gangs often adhere to pre-established geographical areas and carved out territories and often maintain an allegiance to parent national or regional gang (i.e. "Bloods," "Crips," "Surenos," etc.), hybrid gangs function in a much looser sense and are more apt to create alliances and working arrangements with traditional rivals with the ultimate objective of



Figure 15; Weapons seized by Texoma HIDTA ATF
Violent Crime Initiative

making more money. Hybrid gang membership has been documented by many local law enforcement officials and is characterized by an individual having affiliations with multiple gangs. Acts of violence committed by hybrid gangs typically do not involve the turf wars over specific corners and neighborhoods; rather, they are committed in order to earn revenue, such as violent robberies, home invasions, and thefts or to settle much more personalized individual disputes. Most gangs operating in the Texoma HIDTA rely heavily on drug distribution to finance their activities and to earn revenue, including the street-level distribution of cocaine, crack cocaine, prescription drugs, methamphetamine, heroin, and marijuana.

Regarding gang violence, a state of Texas-funded Anti-Gang Task Force (TAG) was recently created in the DFW area to target significant, violent metropolitan gangs. The DFW TAG is comprised of six groups led by the DPS, FBI, ATF, and HSI. These groups are supplemented by DEA special agents and task force officers from local agencies and receive intelligence support from the DPS, ATF, and the Texoma HIDTA RISC. Because violent gangs support their criminal activity through the sale and distribution of narcotics, investigations conducted by the TAG have ties to other narcotics investigations conducted by many agencies in the north Texas area. The North Texas TAG is co-located with the Texoma HIDTA in Irving, Texas in order to further intelligence sharing among all of the entities.



More detailed assessments of gang activity throughout the Texoma HIDTA can be found in the yearly Texas DPS Gang Threat Assessment and the 2015 Texoma HIDTA Gang Threat Assessment prepared by ATF Dallas.

fueled by drug trafficking—the most common criminal activity of gangs in the domain—which inevitably leads to other crimes, such as drug rip-off robberies and aggravated assaults. Significant gang threats to the domain include Tango Blast, Aryan Brotherhood of Texas, Outlaw Motorcycle Gangs, and various factions of the Bloods and Crips due to their extensive criminal reach across multiple areas in the domain, significant involvement in drug trafficking, and propensity to commit violence. MTCOs and associated drug distribution networks serve as major suppliers to local gangs.

- Some "umbrella gangs" operate as a collection of gangs and cliques. For example, the
 65 Groveside gang
 members, including both Bloods and Crips sets. 65 Groveside operates in the Pleasant
 Grove section of Dallas and is heavily involved in the distribution of heroin, cocaine,
 crack, promethazine, PCP, marijuana, and pharmaceuticals. Members of the gang also
 frequent engage in drive-by shootings, weapons violations, robbery, aggravated
 assaults, murder, and other violent crime.
- Members of the Bloods and Crips in South and West Dallas have been linked to a number of street-level violent crimes, as well as the distribution of heroin that has resulted in overdose deaths.
- A number of local gangs specific to the DFW region also pose a threat to the area. including such groups as the "Swervin Money Gang" operating in Irving, Grand Prairie, and Arlington; the "East Side Homeboys," a large Hispanic gang operating in Dallas; and the "Northside Locos" operating in Richardson and along the border of Plano. Dallas PD notes a significant threat posed by the 300s and Bonton Bloods in northwest Dallas. Law enforcement within Dallas and several surrounding cities have also noted an influx of Gangster Disciples and Latin Kings from other areas of the United States in order to use North Texas as a transit point for drug shipments obtained from Mexican DTOs. A number of Outlaw Motorcycle Gangs, including chapters of the Bandidos, Mongols, Cossacks, and Nazi Low Riders operate in North Texas or transit the area on a regular basis. Recently, investigators have determined members of the Vallucos, a Tango Blast subset that originated in the Rio Grande Valley, are operating in North Texas, where they are engaging in the distribution of multi-pound quantities of methamphetamine and heroin. Because of their historical ties to the Mexican drug trafficking organizations operating in the McAllen and Brownsville areas, Vallucos members are able to obtain significant quantities of narcotics from Mexican sources of supply in the Rio Grande Valley.

Tango Blast members operating in Dallas who are involved in the distribution of illegal narcotics, including methamphetamine, heroin, and cocaine, are also involved in a number of other crimes, including illegal firearms sales, shootings, robberies, burglaries, and assaults on other gang members. While Tango Blast lacks the defined hierarchy seen in some other gangs, individual members gain leadership roles by nature of their relationships with Mexico-based sources of supply. Some Dallas area Tango Blast members are believed to be supplied by individuals associated with the Gulf Cartel and Los Zetas.

Gang members in North Texas are increasingly utilizing social media to post about their activities. In both Dallas and Fort Worth, gang officers have noted inter-gang violence is increasingly encouraged by the posting of self-produced rap videos on social media sites where members of one gang "call out" members of another. Gangs distribute a variety of controlled substances, including diverted pharmaceuticals that are often stolen during pharmacy robberies, and high-end marijuana. As with many cities in the United States, over the last year, Dallas and

Fort Worth have both seen increases in violent crime, with at least a portion of it attributable to gang and drug activity in both cities.

The West Texas/Panhandle region of Texas has a significant presence of Hispanic, African-American, and white supremacist gangs. Many of the gangs considered by the Texas Department of Public Safety as "Tier 1" and "Tier 2" gang threats operate in Lubbock and the surrounding counties to include Hockley, Hale, and Howard counties. Lubbock County SO and Lubbock PD alone have identified approximately 1,509 registered gang members (and this number is growing daily) living within the region. Specifically, the West Texas Tangos (a subset of Tango Blast), the Texas Syndicate, the Aryan Brotherhood of Texas, the Texas Mexican Mafia. Latin Kings and subsets of the Bloods and Crips are known to operate in the Llano Estacado region. The Latin Kings have a strong presence in Big Spring, Lubbock, Plainview and Levelland and these members work together to smuggle drug shipments from the Lower Rio Grande Valley to Chicago and

Regional Gang Threat: In October 2016, a combined investigation by the Lubbock Sheriff's Office, DEA Lubbock, HSI Lubbock, Texas DPS, and Lubbock PD SWAT seized two kilograms of cocaine, firearms, six vehicles, and \$37,799 in US Currency following the execution of five search warrants. The investigation targeted members of the Crips Street Gang that were distributing cocaine and from crack cocaine various locations throughout Lubbock.

Indiana via Big Spring and Lubbock. The Latin Kings have committed multiple murders in Lubbock, Big Spring, and Midland in furtherance of their ongoing involvement in narcotics smuggling. Shipments of weapons have been seized in the past in Hale County from Latin Kings members from Chicago who were headed to Hammond, Indiana and Chicago from Big Spring. In addition to drug distribution, these gangs are involved in violent crime, including kidnappings, aggravated assaults, and thefts and burglaries. Several outlaw motorcycle gangs (OMG) operate in West Texas as well. For example, intelligence from the FBI and Big Spring PD Narcotics Division has identified several OMGs operating in Big Spring who are involved in methamphetamine and marijuana trafficking; the OMG members claimed an affiliation with the Bandidos OMG.

A number of Texoma HIDTA Initiative investigations have identified links between cartel-linked Mexican methamphetamine distribution cells and members of the Aryan Brotherhood in North Texas and elsewhere in the state. Aryan Brotherhood members in the West Texas area around Amarillo have moved up from low to mid-level drug distributors and now routinely distribute pound quantities of methamphetamine. Additionally, DEA Dallas investigations have observed heroin distribution by middle and lower level suppliers to members of DFW-area street gangs, including affiliates of the Crips, Surenos 13, and Tango Blast. For the most part, interaction between cartel-linked distribution cells and gangs is a supplier-customer arrangement based on individual relationships and is not the outgrowth of organized pact between cartel and gang leadership. Throughout the region, multiple agencies have noted a variety of gangs have formed alliances in order to make money from the distribution and sale of narcotics by capitalizing on one group's drug source of supply connections at any given time; other alliances have formed to share proceeds from robberies, prostitution rackets, and burglaries. At times, these alliances have bridged long-standing rivalries, including coordination between Blood and Crip subsets in Dallas and Fort Worth.

Oklahoma: As in Texas, a number of street and prison gangs are directly involved in the distribution of drugs in Oklahoma's major cities, including Oklahoma City, Ardmore, and Tulsa; additionally, several gangs coordinate the distribution of methamphetamine and crack cocaine

both inside and outside the Oklahoma prison system. Confirmed gangs operating in the state include subsets of the Crips, Bloods, Surenos, Latin Kings, Gangster Disciples and MS-13. White supremacist gangs like the Aryan Circle, Universal Aryan Brotherhood, and White Anglo Saxon Protestants (W.A.S.P.) are also active in the state.

The Universal Aryan Brotherhood (UAB) is a well-organized and structured white supremacy male prison gang operating throughout the Oklahoma prison system. DEA investigations identified UAB members who managed the distribution of methamphetamine and marijuana in the prison system and on the streets of Oklahoma City and McAlester. A number of investigations in Oklahoma are also targeting the Irish Mob, another Oklahoma Prison gang that is rapidly being a rival of UAB. Irish Mob members are capitalizing on prison connections with Hispanic DTO sources of supply in order to obtain multi-pound quantities of methamphetamine in Oklahoma City that is then redistributed throughout the state. In July 2016, the Texoma HIDTA Central Oklahoma Drug Task Force concluded a multi-agency OCDETF investigation targeted Irish Mob members who controlled methamphetamine distribution activities throughout the state of Oklahoma while incarcerated in the state penitentiary. Over the course of the investigation, agents made 30 arrests, and seized over 106 pounds of methamphetamine, and 3.2 pounds of heroin.

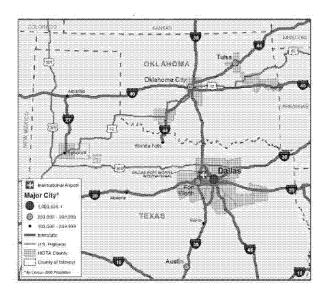
The Indian Brotherhood (IBH) has become one of the largest Native American gangs in the Oklahoma Department of Corrections, as well as one of the most violent. The IBH functions as a five member High Council, which oversees 329 current members. The gang is extremely compartmentalized, with each prison being overseen by its own War Chief. Instructions on activities for War Chiefs and members both in and out of OK DOC custody come from a vote by the High Council. The Indian Brotherhood gang is known to be extremely violent both in and out of prison. They are known to use firearms during drug activities and are quick to threaten violence. The IBH is currently tied to multiple investigations across the State of Oklahoma. Investigative intelligence connects members to the distribution of multiple pounds of methamphetamine on a weekly basis. Over the past few years, the IBH has been tied to "hits" that include the dismemberment and burning of a victim. ¹⁵

As described above, crack cocaine in Tulsa has been dominated by the Hoover Crips street gang. Past investigations have identified links between the leadership of the Tulsa Hoover Crips and an Oklahoma City-based Mexican sources of supply for cocaine and marijuana. Within Tulsa, the Hoover Crips and Neighborhood Crips have a long standing feud, leading to all-out war from time to time. Other African-American gang sets affiliated with the Bloods operate in Tulsa, including Pirus and Red Mob Gangsters. Increasingly, Hispanic gangs, including affiliates of the Surenos, Latin Kings, and Juaritos. As with other areas of the Texoma HIDTA, gang violence is typically territorial or turf based, and gang members operate within and in between cities to facilitate their criminal enterprises.

¹⁵ DEA Dallas Bulletin: Emergence of the Indian Brotherhood Gang in Oklahoma (DEA-DAL-BUL-140-17)

Drug Transportation Methods

The Texoma HIDTA region's extensive transportation infrastructure and strategic proximity to Mexico contribute to making the region an attractive area for TCOs to conduct their criminal activities. Transportation networks in North Texas and Oklahoma are used to move drugs into the Texoma HIDTA region and beyond, to major metropolitan cities in the East and Midwest. The Interstate Highway systems that crisscross the area, coupled with numerous Texas and Oklahoma State highway systems, afford trafficking organizations great flexibility regarding the movement of drugs from south to north and from west to east, as well as the movement of currency via reciprocal routes.



Interstate 35 continues to be the primary route for the movement of drugs from border towns along the Texas-Mexico border to intended destinations within North Texas. Once the shipments arrive in Dallas, Texas and/or neighboring cities, they are then re-distributed to major metropolitan cities in the Midwest and Eastern United States, including Chicago, Illinois; Atlanta, Georgia; Oklahoma City, OK; New York, NY; Nashville and Memphis, Tennessee; and cities throughout Florida. Laredo, Brownsville, and McAllen continue to be primary Ports of Entry for drugs destined for the Texoma HIDTA region; however, investigations have also revealed at times, drug shipments destined for DFW are entering the United States in Southern California and El Paso; Interstates 20 and 30 which dissect the DFW Metroplex, are primary routes for drug shipments sent from the Western United States.

Within Oklahoma, Interstates 35 and 40 are major drug transportation routes to Oklahoma City for drug shipments sent from Southern California, Arizona, and Dallas-Fort Worth. Drug shipments are routinely interdicted on Interstate 44, impacting the Tulsa area. The US-75/US-69 and I-40 corridors also directly impact Southeastern Oklahoma, including Pittsburgh and McIntosh Counties, both now designated as Texoma HIDTA counties.

Interstate 40 through the Texas Panhandle is a critical transportation corridor for drug shipments sent from the West Coast and through Arizona from Mexico. The I-40 corridor continues to be the main route for Sinaloa Cartel-linked drug shipments sent via Southern California and Arizona; Texas DPS statistics indicate the leading destination for marijuana, heroin, methamphetamine, and cocaine shipments interdicted in the Panhandle is Oklahoma,

specifically Oklahoma City. Other I-40 corridor drug shipments are destined for other Texoma HIDTA region cities, including the DFW area and Lubbock, or transit the region to destinations in the eastern United States. I-40 is also a primary transportation route for domestically produced marijuana in California, the Pacific Northwest, and Colorado.

proximately ethamphetan ajority of the	In FY 2016, the DEA anchored Texoma HIDTA Texas Panhandle PDI), along with its state and local partners including Texas DPS, seized kilograms of cocaine, 66 kilograms of heroin, 263 kilograms of e, 901 kilograms of marijuana, and over \$424,000 in cash and assets. The seizures were, demonstrating the today through the region. In FY2015-2016,, deading to additional seizures of drugs and money in cities throughout the
dwest, North	ist, and Southeast United States.

Law enforcement now routinely encounters DTOs engaged in the distribution of kilogram quantities of multiple drugs at the same time.

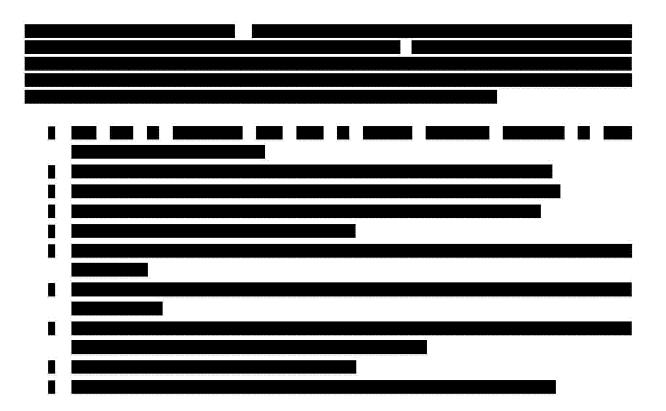




Figure 17: Heroin seized from PVC pipes by Texama HIDTA Western Drug Squad

Figure 18: Methamphetamine seized by Texoma HIDTA Initiatives

C. Marijuana Production

As discussed above, marijuana production occurs throughout the Texoma HIDTA AOR in both Texas and Oklahoma. Among law enforcement agencies responding to the DEA National Drug Threat Survey:

- 66% responded that marijuana was cultivated indoors;
- 50% responded that marijuana was cultivated outdoors;
- 41% responded that marijuana was cultivated hydroponically

It should be noted these percentages are a decrease from figures reported in last year's Threat Assessment; one explanation for the decrease could be that individuals who would otherwise cultivate marijuana within the region have increasingly been drawn to sources of supply in states where marijuana cultivation is legal under state law.

The organizations responsible for the indoor grows have the capability to cultivate and distribute multiple hundred pounds of high-grade marijuana. Elaborate indoor marijuana grow operations are encountered in residences with the grow operations set up in multiple stage grows that allowed for a steady harvest of fully grown marijuana. According to DEA Dallas enforcement personnel, most indoor marijuana grow operations are similar. Typically enforcement finds that growers are renting approximately 3,000 square foot houses, with attached garages. The growers typically access the residence through the garage, often barricade the exterior doors, obscure the windows, and cover the walls and floors with plastic sheeting. Growers will use an assortment of large vertical and horizontal reflectors with 400 to 1,000 watt bulbs as their lighting source. In addition, growers will typically set another breaker box near the main breaker box and illegally wire the secondary box off the main fuse. The grow rooms typically consist of plastic lined rooms with 4 to 6 large grow lights hung from the ceiling on chains about 4 to 5 feet off the ground. They will also use oscillating fans, generally mounted on the wall to help circulate the air. Each room will typically contain a 3- to- 4-foot round charcoal filter, sometimes connected to the household air conditioning system.

Outdoor grow operations, similar to those seized under the DEA Domestic Cannabis Eradication Program, typically occur in rural areas near natural water sources.

In 2016, large outdoor marijuana grows were discovered in east Texas near Tyler and in west Texas near San Angelo. This trend has been observed in other areas of Texas in recent years, including the Texas Panhandle and East Texas and is potentially the result of increasing law enforcement efforts related to cross-border marijuana smuggling from Mexican and an outgrowth of the domestic grow operations in California, Colorado, and elsewhere.

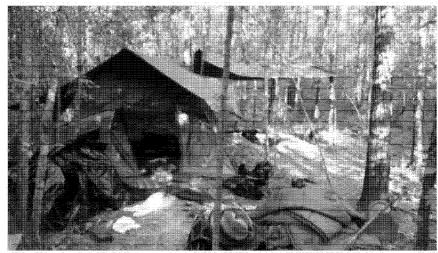




Figure 19: Outdoor marijuana grow operation seized by DEA Tyler in 2016

D. Methamphetamine Production

Mexico is the primary producer of most of the methamphetamine available in the Texoma HIDTA AOR, with much of the methamphetamine originating in the states of Michoacán, Guerrero, Jalisco, and Sinaloa regions of Mexico. Methamphetamine conversion laboratories, which are used to convert liquid and powder methamphetamine into crystal methamphetamine, are commonly encountered throughout the Texoma HIDTA AOR, especially in the DFW area. A typical conversion laboratory includes a variety of vessels used to hold the liquid methamphetamine during the conversion process, including large cooking pots and Thermosstyle containers, along with large amounts of acetone and fans used to circulate the air and fumes. Traffickers often use screens or other flat surfaces to allow the methamphetamine to crystallize into ice shards, which are then cleaned with acetone or other solvents to obtain the bright, crystallized appearance. Although conversion labs are not as volatile as traditional clandestine laboratories, they still present significant risks to health and for fire and explosion due to the extensive use of flammable chemicals in the conversion process.

Oklahoma has seen a dramatic decrease in reports of clandestine methamphetamine labs and chemical dump sites in recent years. Most domestically produced methamphetamine in

Oklahoma is produced by the "One Pot" method, a variant of the Birch or "Nazi" method of cooking methamphetamine using a single container, usually a 2-liter bottle. Pseudoephedrine (PSE) and ammonium nitrate such as that from an Instant Cold Pack, are combined with sodium/potassium hydroxide (lye), solvent (usually either ethyl ether or Coleman fuel), lithium (usually stripped from batteries), and water. The container is then inverted and/or shaken to mix the ingredients. The resulting reaction converts the PSE into PSE base, which dissolves in the solvent. The solvent is removed and hydrogen chloride gas bubbled through creating the final product. The process typically results in a couple of grams of final product. Health and environmental issues include illegal dumping of environmentally unsafe by-products into trash sites and water systems.

Since 2011, EPIC Clandestine lab seizure reporting for Oklahoma shows a steady downward trend in the number of seized laboratories and dump sites. In 2016, approximately 44 clandestine laboratories/chemical dumpsites were reported to EPIC by law enforcement officials in the state of Oklahoma, down from a high of nearly 1000 in 2011. Most of these were concentrated in the Tulsa and Muskogee areas in eastern Oklahoma. The decline of the One Pot methamphetamine production method throughout the NE Oklahoma area is predominantly due to the high-purity Mexican produced methamphetamine which continues to arrive in Oklahoma in significant and increasing quantities. Investigations, intelligence, case initiations, seizures and arrests all indicate that Mexican-produced methamphetamine now dominates the Oklahoma market.

ě

E. Prescription Drug Diversion

As prescription drug diversion is one of main drug threats in the Texoma HIDTA region, it is discussed in detail above.

F. Drug Consumption

Methamphetamine consumption remains widespread throughout the Texoma HIDTA AOR, especially in the more rural parts of the region. The majority of the methamphetamine consumed in the Texoma HIDTA region is the more potent P2P (phenyl-2-propanone) methamphetamine made in Mexico and the average potency and purity of methamphetamine is in the mid-to-high ninetieth percentile. In addition to methamphetamine, prescription drugs, black tar heroin, fentanyl, and synthetic drugs like K2/Spice and NBOMe have all been the source of overdoses and overdose deaths among the juvenile and young adult populations in the Texoma HIDTA region area. The DEA Heroin Task Force routinely assists local police departments in the DFW area with heroin overdose investigations; for example, in October 2016, a heroin distributor in Farmers Branch, Texas was arrested for her role in distributing heroin that contributed to heroin overdoses in Farmers Branch. Additionally, a new Texoma HIDTA DEA Initiative focused on disrupting drug trafficking activities in the southern portion of the DFW Metroplex (including southern Dallas, Ellis, Navarro, and Kaufman counties) has learned of heroin and other opioid overdoses in the southern DFW area.

Communities throughout the Texoma HIDTA AOR are also encountering rashes of overdoses from various synthetic drugs, especially synthetic cannabinoids, but also other synthetic drugs like NBOMe and synthetic opioids. Hospitals have reported overdose instances involving other synthetic drugs, including U-47700, a synthetic opioid which is reported to be over 7.5 times more potent that morphine.

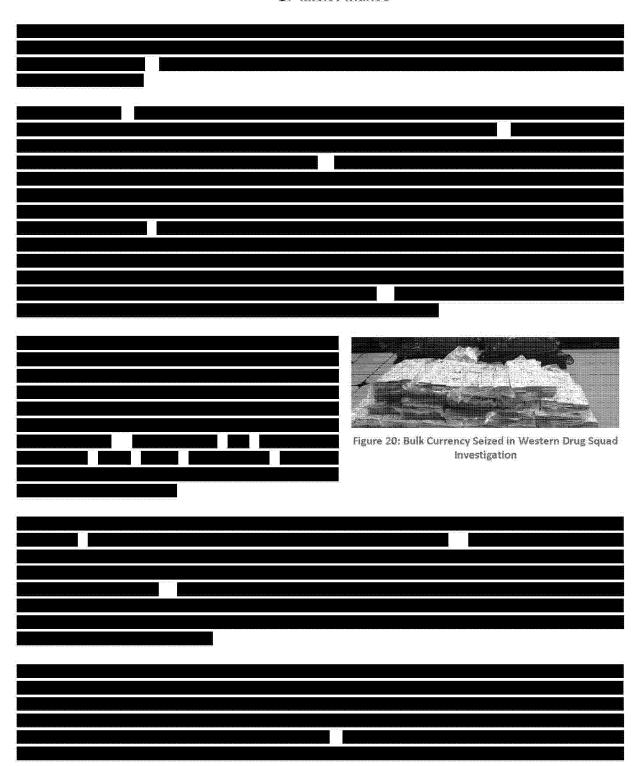
Law enforcement agencies in the Texoma HIDTA region have learned of several fentanyl overdoses, though not nearly to the extent or frequency of those being encountered in the northeast from fentanyl laced heroin. As discussed above, a number of fentanyl related overdoses were reported in the Lubbock area as the result of one DTO that created a market for the drug among the area's opioid addicts by importing raw product from China. Overdoses related to abuse of fentanyl patches and counterfeit pills containing fentanyl have occurred in Oklahoma and investigators have learned of overdose death involving fentanyl analogues in suburban DFW areas.¹⁶

The *Drug Facts among Texas Youth 2016* report compiled by the Texas Department of State Health Services and Texas A&M indicated marijuana continues to be the most widely used illicit drug among Texas youth. While lifetime use of marijuana decreased from 23.2 percent of students in 2014 to 20.8 percent in 2016, past-month use of marijuana increased from 9.1 percent of students to 12.2 percent of students. Use of cocaine or crack increased slightly from 2.2 percent of students reporting they had ever tried cocaine or crack in 2014 to 3.0 percent in 2016. Non-medical use of prescription drugs also increased slightly from 2014 to 2016, particularly for Xanax and Valium.

¹⁶ DEA Dallas Bulletin: Synthetic Opioid Furanyl Fentanyl Tied to Two Recent Dallas Area Deaths

Other notable statistics related to abuse of specific drugs is discussed in greater detail above in the drug sections.

G. Illicit Finance



HIDTA DEA Eastern Initiative

H. Emerging or Other Drug Threats

The Texoma HIDTA region faces a number of potential threats from heroin trafficking, which is already a substantial drug threat. Law enforcement investigations continue to identify poly-drug Mexican DTOs that engage in heroin trafficking in addition to methamphetamine, and, to a lesser extent, cocaine distribution. Many of these DTOs have perfected methods to transport significant amounts of methamphetamine in both solid and liquid form, and the flow of methamphetamine to the region has continued unabated. Over the last year, law enforcement has continued to see the co-mingling of, in particular, methamphetamine and heroin in drug shipments sent to and through the Texoma HIDTA by Mexican DTOs. Should these organizations make a concerted effort to apply these techniques to heroin trafficking and distribution, potential exists for the supply of heroin to the area to increase, with a resulting downward pressure on prices. The fact that heroin already exists as a cheaper alternative to heavily abused prescription opioids only contributes to this potential threat. The possibility also continues to exist that some Mexican DTOs, seeking to earn a higher profit margin amidst the current glut of low-priced methamphetamine, could seek to increase their role in trafficking heroin or cocaine as a diversification. While the Texoma HIDTA area has not encountered the rashes of fentanyl/heroin-linked overdoses seen in the Northeast, there have been increasing indications of attempts to mix fentanyl and black tar heroin, the predominant type of heroin encountered in North Texas and Oklahoma. Should Mexican DTOs perfect this technique or succeed in introducing powdered brown or white heroin to the drug marketplace, the Texoma HIDTA region could easily see rapidly increasing levels of overdoses.

Similarly, the distribution of counterfeit oxycodone/hydrocodone pills that actually contain fentanyl and fentanyl analogues is a significant development in the overall drug marketplace in the Texoma HIDTA. Both North Texas and Oklahoma have a significant drug user population that abuses opioid prescription pills, and opioid pills are routinely distributed alongside traditional drugs at the retail level. An increased flow of fentanyl pills would find a willing, and perhaps given the counterfeit nature of them, unsuspecting user population in the Texoma HIDTA.

Although synthetic drugs, mainly synthetic cannabinoids, pose an existing drug threat to the area, the ever-evolving nature of synthetic drugs through alterations of chemistry will continue to keep new synthetic drugs and their analogues as an ever-emerging threat. New varieties of SCCs, including those inhaled in liquid form through vape pens and e-cigarette equipment, synthetic cathinones (Bath Salts), Phenethylamines (such as NBOMEe variants), tryptamines (related to psilocin), and Piperizines (that mimic MDMA) will likely continue to be encountered by law enforcement in new and dangerous forms.

A number of law enforcement agencies in both Texas and Oklahoma have indicated African-American street gangs, particularly those who have historically been heavily involved in crack cocaine distribution, are now actively seeking to move into the methamphetamine distribution market.

IV. Outlook

Although no significant changes in the regional drug and drug trafficking threat landscape are expected in the near term, the following situations might be kept in mind as having a potential impact in the evolution of Texoma HIDTA AOR drug trafficking activities:

During the past year, every major Mexican drug cartel impacting the Texoma HIDTA AOR has continued to suffered substantial losses to its leadership. Law enforcement actions in Mexico have led to the arrest or death of key command and control figures in most of the major cartels. These arrests notwithstanding, most of the major Mexican cartels, as well as independent Mexican drug trafficking organizations aligned with them, continue to maintain transportation and distribution infrastructures within the Texoma HIDTA AOR. As a result, the region will continue to remain a key revenue source for these cartels, as well as for newer cartels like the Cartel de Jalisco Nuevo Generacion, which are seeking to exploit weakness of their rivals. Mexico-based sources of supply with a proven track record of effectively managing distribution cells in North Texas and Oklahoma will be key allies for the new leadership that emerges among these cartels. As such, the Texoma HIDTA region will continue to see large shipments of methamphetamine, cocaine, heroin, and marijuana from both organized Mexican drug cartels and independent organizations.

The Texoma HIDTA assesses the potential still exists for heroin and fentanyl to grow into an even more significant and deadly threat than it is currently. The combination of rising prices for diverted opiate pharmaceuticals as a result of crackdowns on pill mills, along with larger and more profitable shipments of heroin by Mexican DTOs that have already shown persistence and ingenuity in perfecting the Mexico-U.S. methamphetamine pipeline, suggests heroin trafficking and distribution will remain a persistent drug threat in the Texoma HIDTA region. The continued evolution of threat from Alleged Mexican White heroin will add an additional component to the heroin market in the area, particularly if Mexico-based DTOs are able to bring the cost down to compete with black tar heroin.

The trend of organizations and individuals in Texas and Oklahoma seeking to exploit permissive marijuana laws in other states will continue, and more DTOs will likely attempt to establish a base of operations in states like Colorado, Washington, and California in order to secure a more potent cannabis product. The resulting demand for a more potent product may result in additional regional marijuana production in outdoor and indoor grows. As the economy for legal marijuana develops in states with permissive laws, raw materials for marijuana cultivation and hydroponic grow sites, as well as high potency strains of marijuana from marijuana dispensaries and retail sites will invariably trickle into other states and impact local drug markets.

Production, distribution, and abuse of synthetic drugs will continue to be an ever-evolving challenge to law enforcement, as federal, state, and local laws struggle to keep up with analogues and new chemical compounds in so-called "designer" drugs. The fact that many of these drugs are marketed as "legal" highs in retail establishments only complicates law enforcement's ability to address and educate the public and law makers about the true dangers of these substances.

V. Methodology

The 2017 Texoma HIDTA Threat Assessment was prepared using a number of intelligence products prepared by Texoma HIDTA partner agencies. Since DEA Dallas has an area of operations virtually identical to the HIDTA and DEA Dallas co-manages the Texoma HIDTA Regional Intelligence Support Center (RISC), this assessment relies heavily on strategic drug trend information collected and reported under DEA's Trends in Traffic Reporting System from DEA investigative and intelligence sources. Additionally, responses from the DEA National Drug Threat Survey by law enforcement agencies within the Texoma HIDTA AOR were analyzed and are referenced throughout this report.

However, in an effort to make this year's threat assessment more reflective of all of the Texoma HIDTA partner agencies, input was also obtained from informal discussions with members of the Texoma HIDTA and other law enforcement entities, including members of the Texoma HIDTA Intelligence Subcommittee, comprised of members of DEA, ATF, FBI, and HSI Dallas, Arlington PD, Dallas PD, and the Texas National Guard Counterdrug Program.

Specific source documents used in the preparation of this report include:

- 2016 DEA Dallas Trends in Traffic Reports (July 2015 and December 2015)
- 2016 DEA National Drug Threat Survey and Assessment
- 2015 Texoma HIDTA Gang Threat Assessment, prepared by ATF Dallas
- 2015 Texas Department of Public Safety Gang Threat Assessment
- 2017 Texas DPS Texas Public Safety Threat Overview
- FBI Dallas Drug Threat Assessment, including the following FBI Dallas Intelligence Products:
 - Joint FBI-DEA External Intelligence Note: North Texas Murder by Beltran Leyva Organization Demonstrates Extensive Covert Preoperational Planning and Control with No Warning to US Law Enforcement, 20 April 2017
 - Resilient La Familia Michoacána Networks Very Likely Reconstituted in Dallas Area, Despite Arrests and Deportations between 2006 and 2012, 13 April 2017
 - Mexican Drug Cartel Members/Associates Using Mexican "Zote" Soap Bars to Smuggle Drugs into United States, as of mid-January 2017, 07 March 2017
- Drug seizure data for Texoma HIDTA Enforcement Initiatives reported in the Texoma HIDTA Performance Management Process (PMP) database
- Arlington Police Department 2015 Threat Domain Assessment
- Oklahoma City Police Department Domain Threat Domain Assessment
- Dallas Police Department Domain Threat Assessment
- National Seizure System data from the El Paso Intelligence Center
- National Forensic Laboratory Information System data analyzed and mapped by DEA Office of Special Intelligence
- Texoma HIDTA RISC Bulletin: DFW Meth Madness; Fentanyl Pills
- Substance Abuse Trends in Texas, August 2016, by Jane C. Maxwell, Ph.D.
- Drug Facts Among Texas Youth 2016, Texas Health and Human Services
- Texas Poison Control Network Drug Exposure data
- Texas Department of State Health Services drug mortality statistics

- DEA Dallas Intelligence Bulletins:
 - Prescription Opioid Trends in Oklahoma (DEA-DAL-BUL-157-17)
 - Emergence of Indian Brotherhood in Oklahoma (DEA-DAL-BUL-140-17)
 - Synthetic Opioid Furanyl Fentanyl (DEA-DAL-BUL-137-17)
 - Cannabinoids: Combatting Synthetic Drugs (DEA-DAL-BUL-109-17)

0

0

0

VI. Appendix of Contributing Agencies & Offices

A number of law enforcement partners contributed to this assessment, either indirectly through responses to the DEA National Drug Threat Assessment Survey or directly from the sharing of intelligence products and threat assessments, participation at Texoma HIDTA-hosted symposiums and meetings, or through informal discussions and review of investigative reports prepared by Texoma HIDTA Initiative personnel and Subject Matter Experts. The Texoma HIDTA Regional Intelligence Support Center expresses its appreciation to all of the valuable law enforcement input which has contributed to the preparation of this document. In particular, the DEA and FBI Dallas Field Division Intelligence Groups contributed substantially to this product.

Abilene, Texas Police Department

Ada Oklahoma Police Department/District 22 Drug Task Force

Amarillo, Texas Police Department

Arlington, Texas Police Department

Anderson County Sheriff's Department

ATF Dallas/Violent Crime Task Force

ATF Oklahoma

Bethany, Oklahoma Police Department

Carrollton, Texas Police Department

Cedar Hill, Texas Police Department

Chickasaw Nation Lighthorse Police Department

Collin County, Texas Sheriff's Office

Collin County, Texas Coroner's office

Comanche Nation, Oklahoma Police Department

Coweta, Oklahoma Police Department

Dallas County Sheriff's Department

Dallas, Texas Police Department

DEA Dallas Field Division Office

DEA Oklahoma City

DEA McAlester, Oklahoma

DEA Tulsa, Oklahoma

DEA Fort Worth, Texas

DEA Lubbock, Texas

DEA Amarillo, Texas

DEA Tyler, Texas

Decatur Police Department

Denton, Texas Police Department

Duncan, Oklahoma Police Department

Edmond, Oklahoma Police Department

Elk City, Oklahoma Police Department/District II Drug Task Force

Euless, Texas Police Department

Fort Worth, Texas Police Department

FBI Dallas, Texas

Garland, Texas Police Department

Grapevine, Texas Police Department

Gregg County, Texas Organized Drug Enforcement Unit

Henderson County, Texas Sheriff's Office

Homeland Security Investigations, Dallas, Texas

Internal Revenue Service, Dallas, Texas

Irving, Texas Police Department

Kaufman County, Texas Sheriff's Department

Logan County Sheriff's Office, Oklahoma

Lubbock County, Texas Sheriff's Department

Lubbock, Texas Police Department

Mansfield, Texas Police Department

Mesquite, Texas Police Department

Midland County, Texas Sheriff's Office

Midland Police Department

Midlothian, Texas Police Department

Mineral Wells Police Department

Muskogee, Oklahoma Police Department

Navarro County, Texas Sheriff's Office

North Texas Anti-Gang Center

North Richland Hills, Texas Police Department

Oklahoma City, Oklahoma Police Department

Oklahoma Department of Corrections

Osage County, Oklahoma Sheriff's Office

Plano, Texas Police Department

Potter County, Texas Sheriff's Office

Rockwall, Texas Police Department

Richardson, Texas Police Department

Seagoville, Texas Police Department

Smith County, Texas Sheriff's Office

Tarrant County Narcotics Unit

Texas Department of Public Safety

Texas National Guard Counterdrug Program

Tillman County, Oklahoma Sheriff's Office

Tulsa, Oklahoma Police Department

Texas Poison Control Network

Texarkana, Texas Police Department

Tyler, Texas Police Department

Vinita, Oklahoma Police Department

Weatherford-Parker County, Texas Special Crimes Unit

Wichita Falls, Texas Police Department

52